

EVALUATION OF CITY OF BOSTON
FAIR HOUSING PROGRAMS--FINAL PROJECT REPORT

Submitted to Mayor's Office of Fair Housing
by
Boston Urban Observatory
University of Massachusetts at Boston

November 30, 1981

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Joseph S. Slavet

Project Director
(Director, Boston Urban Observatory)

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PROGRAM EVALUATION FINDINGS AND MAJOR RECOMMENDATIONS

Fair Housing Goals

The City of Boston's 3-year Fair Housing Plan(1981-83) identifies the following six goals for achieving greater freedom of choice in housing for its minority residents:

1. To improve the delivery of services relative to the enhancement of freedom of choice to all minorities in Boston as they relate to fair housing.
2. To increase enforcement of fair housing laws.
3. To increase public safety and security to assure equal access throughout the City of Boston.
4. To increase the participation of all minorities and low-and moderate-income people in all City of Boston housing programs.
5. To increase low-cost housing opportunities in Boston city-wide.
6. To promote stabilization in integrated neighborhoods in Boston.*

Underlying these goals are sub-sets of objectives that further refine the primary fair housing missions and are linked to strategies or programs designed as the specific approaches for reaching such objectives.

The purposes of the fair housing evaluation project were to determine whether current fair housing program efforts were doing what they were intended to do and to ascertain the extent to which they were achieving results

*Mayor's Office of Fair Housing, City of Boston Fair Housing Plan, Feb., 1981.

in accordance with their stated objectives and program standards.

Summary of Key Findings

The evaluation indicates that the program efforts of the Mayor's Office of Fair Housing are weighted toward the first goal, an improved fair housing services delivery system. The MOFH role to achieve the remaining five fair housing goals are either catalytic, reporterial (to federal and state agencies) and in a few cases, where deliberately specified, a limited monitoring role. Thus, the MOFH allocates most of its own budget and assigns most of its staff to activities providing information, referral and assistance services to individuals and to educational programs aimed at the public at large or at specific groups.

As documented in detail throughout this final report, even greater detail being available in the monthly progress reports submitted to the Mayor's Office of Fair Housing, our evaluation came to the following conclusions concerning MOFH's bundle of housing assistance and public informational activities:

1. The counseling program generates a very low volume of housing discrimination calls and requests, and the critical issue for this strategy is whether to retain its original thrust toward fair housing counseling, or to redirect staff efforts toward meeting various housing

assistance needs and demands.

2. The public information program has had minimal direct impact on combatting housing discrimination, and it is difficult to establish its degree of influence in sharpening and enhancing the public's awareness of fair housing rights and issues.

3. The affirmative marketing assistance program, although accounting for a relatively small investment of agency resources, shows a low volume of activity and minimal results for such efforts.

4. The minority housing assistance program, conducted through contracts with non-profit multi-service agencies, achieves its basic objective of reducing the language handicaps of Hispanic minority groups seeking housing, but serves relatively small numbers of residents, while City monitoring of contractor performance is weakened by delays in contract execution and reassignment of the monitoring role from MOFH to the Neighborhood Development Agency(NDA).

As for MOFH's catalytic and monitoring responsibilities, our evaluation came to the following conclusions:

1. The Areawide Housing Opportunity Plan(AHOP) is a useful stop-gap alternative for the urgent roles in fair housing enforcement and related services that would be carried out by a metropolitan fair housing agency, but

has only a three-year life.

2. MOFH's monitoring responsibility over activities of the Mayor's Office of Housing was not carefully synchronized with the Year VII CDBG decision-making timetable, did not respond to the needs of the Fair Housing Advisory Board in its own review of minority participation in City housing programs, and is in limbo pending completion by the NDA of needs assessment, program development and performance standards formulation required as conditions in the Year VII CDBG agreement between the City and HUD.

Our evaluation of the housing discrimination audit performed by Abt Associates, Inc. emphasized the following independent conclusions:

1. The research on which this report is based is of extremely high quality.

2. The main conclusion of the report, that racial discrimination in housing availability is widely practiced in Boston, is uncontestable.

3. The findings of the study must be regarded as a lower bound on the extent of racial discrimination in the Boston housing market, since (a) it measured discrimination only in the marketing of advertised housing units, (b) it purposely excluded three neighborhoods where extensive discrimination was found by another recent study and four neighborhoods where blacks rarely search for housing, and

(c) it was cautious both as to methodology and interpretation of results, thereby understating the statistical significance of their results and missing the strong evidence for the existence of racial steering.

4. The report's main recommendations that the City of Boston enact a fair housing ordinance and implement strong enforcement techniques, including the regular use of audits, are "right on target".

Our evaluation of the Fair Housing Advisory Board came to these principal conclusions:

1. While the Board fulfilled its review and recommendation roles with respect to the fair housing plan, the community profile and the banking study, Board perception that it had failed to effect significant changes precipitated diminishing Board effectiveness.

2. Perceived Board failure to produce changes in City policies affecting fair housing conditions were based mainly on non-compliance by responsible City officials with three components of the City's fair housing plan, components requiring Board participation--assisting the Board in the definition of its tasks; establishing performance standards for minority participation in City housing programs; and development of displacement strategies.

3. Perceived Board failure to influence fair housing policies resulted in declining member attendance,

a number of member resignations, and interim suspension of Board activities.

Major Recommendations

Available fair housing operating funds, estimated at \$750,000 per year, should be reallocated to shift the emphasis away from current programs of housing assistance, referrals and public information, to activities that emphasize investigation and enforcement, including a regular audit program, and to strengthening the capacity of the Fair Housing Advisory Board to perform the following significant roles in policy-formulation and oversight:

(1) monitoring and evaluation, (2) networking and support, and (3) advocacy. Below is a proposed functional breakdown of reallocated fair housing resources:

Investigation and enforcement	\$350,000
Housing discrimination audits	100,000
Fair housing policy-formulation, monitoring and evaluation, net- working, and advocacy(Fair Housing Advisory Board)	100,000
Public information/education services	150,000
MOFH administration	50,000
	<u>\$750,000</u>

Below is a summary of recommendations covering individual fair housing programs that are consistent with the overall proposal for reallocation of fair housing resources and that should be considered in subsequent modifications of the City's 3-year fair housing plan. The recommendations

focus on policy rather than operational issues. (See full text for recommendations on program operations.)

1. The counseling program and staff should be scaled back to reflect the low-volume flow of discrimination complaints and integrated into a new investigative/enforcement unit of MOFH.

2. The evaluation methodology used by the Boston Urban Observatory in assessing the impacts of media campaigns, the Newsletter and other public information activities of MOFH should be applied to 1981-82 efforts and the evaluation findings should be used in making a final determination concerning the scope and/or continuation of each public information component.

3. The continuing usefulness of MOFH as a supplement to HUD in affirmative marketing assistance should be re-assessed if proposed changes concerning mailings of affirmative marketing assistance packets to developers and visits to developers (see full text of report) do not produce improvements.

4. The following changes should be made in contract procedures and content to ensure that the City receives expected performance in its minority housing assistance programs:

a. Adequate contractual detail as to scope of services, procedures, and output standards by case category.

b. Execution of contracts in advance of beginning dates of contractual performance periods.

c. Elimination of ambiguities and discrepancies in Cape Verdean monthly reporting system.

d. Delegation by NDA to MOFH of responsibility for supervision and monitoring of the minority housing assistance contracts.

5. The Metropolitan Area Planning Council and the Executive Office of Communities and Development of the Commonwealth of Massachusetts should begin planning for a permanent mechanism in regional fair housing to succeed the short-term Areawide Housing Opportunity Plan (AHOP).

6. The Fair Housing Advisory Board should take over the housing monitoring role of the MOFH and expand the scope of this responsibility to cover the monitoring of all housing programs/services identified in the City's fair housing plan.

7. Periodic auditing should become a regular fair housing program (a) to measure progress in eliminating housing discrimination against the baseline data generated by the Abt Associates, Inc. report, and (b) to serve as an effective tool in enforcing current fair housing legislation and any future fair housing ordinance.

8. In view of its institutional importance for the implementation of Boston's fair housing plan, the following steps should be taken to re-establish the status and continuity of the Fair Housing Advisory Board.

a. The Board should establish a Committee on Governance and Membership to recommend by-laws and to define categories of membership for a reconstituted board that would include persons with more community prestige and power, particularly from banking and real estate interests.

b. Based on criteria for the new membership categories, a joint committee with equal representation of the Board, the City and HUD should select candidates for appointment by the Mayor by the end of January, 1982.

c. The Board should consider adopting the following responsibilities -- (1) monitoring, e.g. of CDBG allocations and program performance; (2) networking and support, e.g. working with such City agencies as the Neighborhood Development Agency, Mayor's Office of Housing, Boston Housing Authority and Police Department to ensure that their activities reflect fair housing policies; and (3) advocacy, e.g. performing a variety of public roles in addressing fair housing issues and concerns through workshops, open forums, etc.

d. To give the Board direct access to those levels of City Administration responsible for housing policy

formulation and implementation, it should report directly to the Deputy Mayor for Development and meet directly with the Mayor from time to time to discuss its work and concerns.

c. To strengthen the cooperation and commitment of HUD to the Board's role, the Boston Area Office should appoint a delegate each year from the staff to serve as its official representative for monitoring the Board and the City's fair housing progress.

f. To provide the Board with adequate staff resources for fulfilling its current review responsibilities and for assuming a broader scope of functions in monitoring/evaluation, networking and advocacy, the Board should have the services of a full-time staff person, employed by the Board and reporting to its Chairperson, to carry out the administrative services of the Board and its committees, supplemented by consultant resources for helping the Board implement recommendations of the BUO program evaluation report and the Abt Associates, Inc. audit, for providing continuing monitoring under priorities and directions of the Board, and for providing assistance with the Board's roles in networking and advocacy.

COUNSELING

Findings

The counseling program is essentially a housing information service since its staff mainly handle requests for housing-related information; housing discrimination cases are relatively infrequent and so-called fair housing counseling takes the form of assisting clients to formalize their complaints rather than to provide them with advice about options. From June 1, 1980 to May 31, 1981, over 93% of the 1661 calls received by MOFH staff were requests for information; only 109 discrimination calls were received, discrimination because of children constituting the prevalent complaint.

--On average, the level of staff effort for counseling services amounted to 4 full-time equivalents, and the direct annual cost of counseling services (excluding fringe benefits and overhead) is estimated at \$36,000.

--A large proportion of MOFH cases--79% of the information cases and 40% of the discrimination cases--were opened and closed the same day; of the 109 discrimination cases, only 23% of the total had complaints served and only 7% were referred to the Massachusetts Commission Against Discrimination.

--Detailed analysis of the counseling workload over

a recent 4-month period indicated that none of the full-time counselors handled more than 7 discrimination cases, while some counselors handled as many as 20 information requests for each discrimination case.

--The counseling caseload is not heavy and the salary cost per case is relatively high; the direct unit cost for providing information to callers is in the range of \$18-25, while the unit cost for discrimination cases averages \$100-\$200 and could be as high as \$300 with the exclusion of out-of-jurisdiction calls.

--An experimental telephone survey of a sample of housing discrimination clients to assess the impact of MOFH on the housing outcomes of such cases did not generate definitive data. Until the time comes when MOFH is handling many more discrimination cases that proceed to MCAD for positive resolution, it is not useful to try to estimate outcomes using the telephone interview approach.

Recommendations

In view of the low volume of housing discrimination cases, MOFH must choose from one of two policy options--fair housing counseling or housing assistance. Under Option A, the counseling program and staff would be scaled back to reflect the current and realistic low-volume flow of complaints but would continue one of the original objectives of the MOFH. Under Option B, the counseling program

would shift its focus, and counseling staff, to be re-titled Information Specialists, would redirect their efforts to meet different kinds of housing assistance demands, including homebuying assistance and maintenance of apartment listings for tenants.

At a more operational level, we believe that MOFH has to pay more attention to the following issues: the role of the supervisor, the purpose of field trips, the collection of managerially-relevant information, and outreach.

The counseling supervisor has shown initiative during the course of this project in managing the counselors. Regardless of the future direction of MOFH (Option A or B), the momentum toward strengthened supervision should continue. The supervisor has obvious roles to play in the training and monitoring of staff, as well as the ongoing evaluation of program activities. The supervisor also has more experience than most of the staff and should be active in trouble-shooting as the need arises. As MOFH clarifies its overall policies and begins to commit resources in a more directed way, the supervisor could be held responsible for assuring the efficiency and effectiveness of program activities. This role would include the gradual establishment of work standards that reflect the level of effort required for different kinds of tasks, more precise job design, and more formal procedures for essential activities

such as follow-up on active cases, and better explanation to clients for "no probable cause" findings.

Field trips are an important phase of MOFH activity. Only so much can be accomplished on the phone and it is not always reasonable to expect clients to come in to the office. The obvious problem of field trips is accountability: what is happening "in the field"? And where is the appropriate place for a person "in the field" to be? With the demise of the Little City Halls, MOFH will have to decide where to base its counselors. If counselors continue to be used for Public Information and Affirmative Marketing Assistance, more formal plans should be developed as to the scope of contacts to be made (e.g. over the course of a month) through field work. At present no such plans are evident. As a result management is vulnerable to the charge that these activities are not productive enough. Regardless of whether Option A or B is followed, MOFH management needs to do a better job than at present to document the value of time spent in the field.

In both Options A and B it will be important to collect additional data for managerial reporting purposes on the number of hours spent working on new and on-going cases, and a quarterly "spot-check" phone survey of clients to gain their impressions of MOFH's services. This information, with the exception of the survey, can be recorded on

specific forms by counselors on an on-going basis and then compiled by the supervisor once a month. When this data is available on a regular basis, more exhaustive analyses can be prepared.

Both proposed options will require careful maintenance of individual case records, especially eliminating the handwritten notes after the typed notes are filed, organizing the notes in chronological order and making sure that all important processing dates (including the closing and MCAD referral dates) are indicated.

We recommend that the filing system in general should be improved through better organization. One counselor should be assigned the responsibility of organizing and maintaining all the case-record files. A good beginning would be the refiling of misfiled cases, new labeling of file drawers, and closing of old cases which are in the active file. All 1981 cases which have been closed can be removed from the counselors' desks and filed in the closed drawers. Cases which have been closed for over 2 years can be discarded. This will release folders for the most recent closed cases.

A final area for operational improvement is outreach. We are frankly puzzled by the low volume of legitimate discrimination cases. As long as MOFH considers this to be a key agency function (Option A), it seems important to find ways to generate a greater volume of cases that proceed

to MCAD resolution. Outreach capabilities are clearly linked, of course, to the Public Information Program.

PUBLIC INFORMATION

Findings

For the past several years, the MOFH public information staff has consisted of a Public Information Officer and Newsletter Editor. Recently, and unexpectedly, both positions became vacant. The Newsletter Editor is responsible for the research, planning, writing, proof reading, and distribution of the MOFH newsletter, Housing Opportunities. He also handles the Affirmative Marketing activities in which the major task is mailing information to housing developers explaining the HUD regulations for and offering MOFH assistance with outreach efforts to attract minority tenants. The Newsletter Editor is supervised by the Public Information Officer, who is in charge of all public information activities. In addition to working on the newsletter, the Public Information Officer plans and oversees all MOFH public information campaigns that are designed to increase public awareness of fair housing policies and to generate discrimination complaints and housing information calls to the Housing Counseling Program.

Media utilized in these campaigns have included television, radio, billboards, MBTA bus and subway cards and posters, newspapers, brochures and posters. The brochures

and posters, like the newsletters, are planned, written and distributed by MOFH staff, but the layout and printing are done by contractors. Newspaper ads and press releases are written and distributed by the Public Information Officer. The television and radio interviews and talk shows are planned and performed by the public information staff and MOFH director respectively. Television, radio, and MBTA advertisements are produced solely under contract.

MOFH intended to allocate a total of over \$100,000 of direct internal and external expenditures in the past fiscal year to the Public Information Program. The recent and unexpected departure of both the Public Information Officer and the Newsletter Editor raises serious questions about the future viability of the Public Information Program.

How successful are these different media in generating discrimination complaints and housing information calls? TV advertising was the most effective case-producing activity. Thirty-three percent of all counseling clients said they heard of the Mayor's Office of Fair Housing through the TV spots. Social service agencies accounted for 7% of the calls, MBTA ads for 4%, and radio ads, newsletters, brochures, newspaper ads and realtors for 2% or less each.

In a further analysis we looked at referral sources for specific types of discrimination complaints received from July 1980 to June 1981. TV advertising again dominated

the field, generating over half of the discrimination calls. In particular, note that 5 times as many child discrimination complaints were TV-referred than any other type of complaint. However, the most significant information obtained from this analysis was the number of blank spaces and small numbers, where no (or very few) cases were generated. MBTA advertising produced only 2 child and 2 racial discrimination complaints in the entire 12-month period. Not one welfare, age, sex, racial or marital discrimination case was generated by a social service agency referral in the same period.

Using the number of information and discrimination cases per referral source and the scope of campaign activities over the same period, we sought to assess the overall effectiveness of public information campaign efforts. Even though the number of counseling cases is relatively small, as previously noted, we expected to find that the public information campaigns would have a strong influence on the case intake rate. We found, however, that the campaigns made only a small difference.

Despite the efforts of the "Housing Counseling" campaign (campaign #3) and the "Fair Housing is for Everyone" (campaign #4), the number of TV-generated cases gradually decreased from 95 in July, 1980 to 12 in June, 1981. The decline might be explained by the short duration or low

frequency of spots shown, the non-advertising period between the campaigns, and the public awareness objective rather than case-generation objective of the latter campaign. Regardless of these or other factors, however, we are concerned that the decrease has been so sharp in the one medium that had been the most successful in bringing in new clients.

The referral record from MBTA ads and social service agencies was even less productive in generating MOFH cases. Again the small number of referred cases overshadowed the slight increases attributable to campaign activities. MBTA-referred cases during the Housing Counseling campaign reached 11 per month, dropped to 2 in December, 1980 and increased again to 8 during the public awareness campaign. The newsletter generated 8 cases in August, 1980 compared with one case in December, 1980. Differences in newspaper, brochure, and radio referrals were minimal.

Social service agency referrals remained fairly stable from July, 1980 to June, 1981, even though the housing counselors increased their visits to agencies beginning in December, 1980. The counselors visited a total of 144 social service agencies during the twelve-month period. Counselors also visited 65 realtors, while only 4 cases were referred by realtors.

Since there was no accurate data available regarding

referral sources prior to July, 1980, we can only make general observations as to the general effectiveness of the series of campaigns by analyzing the total number of cases referred by all sources. During the first campaign, designed to generate discrimination calls, the number of information calls increased from 28 to 49 per month, while discrimination cases dropped from 5 to 1. During the second campaign, which focused on child discrimination, the number of child discrimination complaints rose from 5 to 11 per month, and the total number of information and discrimination cases also increased. For several months between campaigns #2 and #3, the number of information cases dropped while the number of discrimination cases remained at the same (low) level. Campaign #3, emphasizing the MOFH counseling program, brought about a substantial monthly increase in cases, from 44 to 184 information calls and 4 to 18 discrimination calls. Despite these bits of data, it is difficult to draw overall conclusions without complete information about the early campaigns.

Conclusion

Our bottom-line conclusion is that the objectives of the Public Information Program have been nebulous. Considerable activity occurs. As currently designed, about \$100,000 per year is allocated to the effort. However, the program's direct impact on encountering housing discrimination

is minimal and its direct impact on enhancing the public's awareness of fair housing issues and rights is difficult to establish. Currently, this program is almost decimated due to the departure of several key staff members. Now is the time to reflect on the potential value of different kinds of public information activity.

Recommendations

Our recommendations are presented in two parts: policy and operations.

Policy. We believe that the place for MOFH to start, in attempting to unravel the public information maze, is to try to answer several key policy questions. First comes the same basic question that we raised in the concluding section of our evaluation of the Counseling Program: should MOFH admit to being essentially in the business of fair housing assistance and advocacy, rather than the more narrow role of housing discrimination, investigation and enforcement? According to the available data on the Public Information Program, the answer should probably be "yes". Despite the fact that there seems to be some positive correlation between certain media campaigns and percent changes in incoming discrimination cases, there is no denying that the volume of discrimination cases (even at peak periods) is far too low to justify the relatively high cost of these Public Information campaigns. The only possible justifications seem to be either generating sizable increases

in the rate of incoming information requests or in prompting general public awareness of housing discrimination issues and options.

Two secondary related policy issues are media selection and staffing. TV "spot" ads proved to be by far the most effective medium. Other media were highly ineffective. The impact of other media has been negligible, and their use probably should be justified before much future money is spent on them. In the end, however, MOFH may decide to embrace a policy of market saturation based on the untested assumption that indirect benefits (not measurable from the perspective of MOFH) accrue from media campaigns and related activities. For example, how else does one justify the continuing production of a newsletter which fails to have a noticeable impact on MOFH case volumes? If the maintenance of an "MOFH presence" in the community is felt to be a desirable end in itself, then perhaps the low cost-option of more frequent TV interviews would be a reasonable approach to take.

The impact of media selection of staff and budgetary requirements is important to consider at this initial stage of policy planning. Contracted services required for many of these communication activities have an obvious direct cost which needs to be supplemented by planning and monitoring efforts by MOFH staff. Other outputs, notably newsletter

production and visits to social service agencies, can be very labor intensive for MOFH and require the expansion of internal staff resources. MOFH simply may not be able to afford or to justify intensive staff efforts on all fronts. Some difficult trade-offs need to be considered and resolved before moving to more operational improvements in this program.

Operations. The Public Information files, with the exception of the Newsletter records, need to be reorganized in chronological order by campaign. Each campaign section should include the types of media used, contract activity, specific MOFH staff assignments and responsibilities, correspondence, and all other specific campaign activity. A form should be devised for each contracted product such as a brochure or newsletter, including the dates the material was sent to the contractor, returned for proof reading, re-submitted, returned to MOFH and finally distributed. In addition, old files should be discarded and duplicate notes and documents removed.

A yearly budget should be prepared which includes a breakdown of expected contract costs. An on-going record of expenditures should be maintained which includes the costs of the design, layout and printing of each poster, brochure and newsletter, the production of each TV and radio spot and each newspaper advertisement.

Because all staff members are involved in public information activities, a "team effort" approach should be used for each campaign. Acting as coordinator the Public Information Officer should assign specific tasks to individual staff members and assist them in carrying out those responsibilities. The job description of each MOFH position should specify all public information responsibilities, and training should be provided by public information staff to insure adequate performance of those functions.

Monitoring of the media should be greatly increased. Public Information staff should gather data from the 3 major TV stations twice a year, three months after the spots were last shown. When necessary, letters or phone calls should be directed to the stations requesting an increase in frequency, duration or prime-time airings. All monitoring activities should be closely coordinated with the TV contractor. The MBTA advertiser should also be contacted bi-annually to obtain information on the dates and numbers of cards and posters posted and to suggest locations for future postings.

Immediately following each public information campaign, an in-depth assessment should be made to determine the efficiency and effectiveness of that campaign. Similar to the evaluation methodology used by the Boston Urban Observatory, it should include an analysis of the types of media used,

duration and intensity of the efforts and the effect on the generation of new housing counseling cases.

AFFIRMATIVE MARKETING ASSISTANCE

Findings

It is established federal policy that individuals of similar income levels in the same housing market area must have equal housing choices available to them regardless of their race, color, religion, sex, or national origin. The U.S. Department of Housing and Urban Development (HUD) requires each developer or applicant for participation in Federal Housing Administration (FHA) subsidized and market rate housing programs to pursue affirmative fair housing marketing policies which include the following elements: soliciting buyers and tenants, determining their eligibility, and concluding sales and rental transactions.

Developers are required to formulate a marketing strategy to reach a designated target population, based on the location of the housing and the proportional representation of the population in that area. HUD assists the developers in determining the target group occupancy rate when necessary and negotiates a revision of that figure if it is determined to be inaccurate. To achieve the marketing objective, it is necessary for developers to establish an advertising strategy that will reach and interest a sufficient number of qualified buyers and renters. In particular developers are encouraged to contact community groups and leaders who can provide important links to the target population.

Finally, developers must provide periodic training in fair housing regulations to their staff who are engaged in sales and rental activities and to assemble a team that reflects the racial/ethnic composition of the community.

Responsible HUD and City of Boston officials have acknowledged the comprehensiveness and complexity of the required marketing strategy by designating Community Block Grant funds to be used for providing marketing assistance to all developers and applicants for FHA programs. In Year IV (7/1/78-6/30/79), MOFH was designated as the agency in Boston to extend assistance to private housing owners in developing and carrying out the Affirmative Marketing plan. MOFH was required to meet with developers prior to, during and after rent-up or sale to discuss the City's support activities for the following purposes: to respond to developers' requests for assistance; to participate in pre-occupancy conferences as requested by HUD or the Massachusetts Housing Finance Agency (MHFA); and to operate selective minority housing assistance programs (Asian and Hispanic). In Year V (7/1/79-6/30/80), MOFH was required to continue providing the assurances established in Year IV and, in addition, to monitor Affirmative Marketing Assistance activities. In Year VI (7/1/80-6/30/81), MOFH was again identified as responsible for carrying out the previous years' assurances.

For the past several years the Newsletter Editor, with the help and supervision of the Public Information Officer, was responsible for most of the Affirmative Marketing activities. Recently, however, both positions were vacated and very few if any Affirmative Marketing activities are currently being conducted. The prior procedures are summarized below.

The Newsletter Editor (in addition to preparing and publishing the agency newsletter) compiled lists of community developers, assisted developers who called the office, and placed housing advertisements for specific developers in the newsletter. His major and most time-consuming Affirmative Marketing function was the preparation and mailing of packets to developers to assist them in devising their Affirmative Marketing plan. The contents of these packets were: a letter informing developers of the technical assistance available to them through MOFH; the MOFH Fact Sheet; the MOFH Housing Counseling Brochure; the Housing Directory Brochure listing community agencies that provide housing services and programs; and the latest issue of the newsletter, Housing Opportunities.

Housing Counselors provided one-to-one Affirmative Marketing assistance while visiting developer and realtor offices as part of their field activities. The counselors also occasionally spoke with developers on the phone and

referred clients who needed housing to those developers facing minority requirements who had informed MOFH of their desire to take applications. By reviewing the weekly reports of the Newsletter Editor from November 1980 through March 1981, we learned that out of 68 work days, only 10 days (15% of the total) were spent on full-time Affirmative Marketing activities. The 15 percent estimate represents \$2,100 of the total salary of \$14,000.

We further assumed that since 90% of the Public Information Officer's time was spent on activities other than Affirmative Marketing, that 5% or \$850 of her total salary is a reasonable estimate for time devoted to the Affirmative Marketing Program. Acknowledging that the Housing Counselors spent a relatively small amount of their time visiting developers, speaking to developprs on the phone, and referring clients for housing from developer listings, we estimated that approximately 2% at most, or \$750 of their combined salaries, represented Affirmative Marketing activities. Therefore our total estimate of the annual cost of personnel services for the Affirmative Marketing Program, excluding fringe benefits, office expenses, overhead costs, or contracting expenses, is only \$3700. For the 15-month period from April 1, 1980 to June 30, 1981 the activity of Affirmative Marketing was extremely limited. During the 7-month period from April

to October, 1980, the MOFH received only 8 inquiries, no packets were mailed, no pre-occupancy meetings were attended. It seems unlikely that few developers were visited.

The major activities since November 1980 consisted of developer visits and packet mailings. From December 1980 to June 1981 the three full-time counsellors made 23 visits to developers in their assigned neighborhoods. Most of the visits were on a drop-in-basis, informal in nature, and varied in length from 10 minutes to an hour. Most of the well-established development firms visited had heard of or dealt with MOFH in some capacity in the past and differed in their attitudes during the counselors' visits. The majority of developers visited had properties that were already constructed and at least partially "rented-up". According to the counselors, these developers were familiar with Affirmative Marketing regulations and appeared to understand the requirements. The information discussed during the meetings usually included the following: the type of development, such as family or elderly units; number of units, application procedures and status; advertising strategies used; specific federal programs on subsidies the developers had applied for; and potentially beneficial community contacts. The counselors offered to provide assistance needed in any of these areas. The

counselors also checked to see whether the required fair housing regulations posters were displayed and other relevant information easily accessible to the developers' clients. It is important to note that the counselors had received no formal training in Affirmative Marketing to prepare them for these visits. Thus, we could not determine whether a thorough and consistent set of procedures had been followed.

In addition to assembling the packets to developers, MOFH had to identify those developers to whom the packets should be mailed. The U.S. Department of Housing and Urban Development sends monthly computer printouts to MOFH listing the names and locations of developments, number of project units, type of federal subsidies expected, and construction starts and completion dates. Each target date is updated and actual completion dates noted each month. Affirmative Marketing packets are sent by MOFH to those developers in the Boston area whose rent-up periods will occur during the coming 12 months. We reviewed the HUD printouts for January 1981 and found that packets had been mailed from November 1980 to February 1981 to most of the greater Boston developers with construction completion dates scheduled for the first 3 months of 1982. Due to the small number of developers listed, however, only 27 packets were sent out from the start of the mailing activity in November 1980 through February 1981.

Nine developers and one public housing authority representative contacted MOFH from April 1, 1980 to June 30, 1981. Seven of these ten callers requested assistance in general outreach to elderly and/or elderly minority clients. Another requested names of minority applicants who qualified for the Section 8 program and wanted to live in a specific community. Of the remaining two, one requested assistance for 15 months in the future and the other wanted names of community agencies that they may have overlooked. MOFH responded to these inquiries by giving eight callers lists of community agencies which could assist them in outreach, offering six callers free advertising in Housing Opportunities and two callers the names of minority newspapers that accept housing advertising. MOFH also contacted prospective minority applicants for the housing authority representative who requested that service. It appears from the MOFH reports that appropriate and potentially beneficial assistance was given to each developer. However, it is notable that only 10 calls were received in fifteen months.

A MOFH representative (the Public Information Officer) attended only one pre-occupancy meeting in the period from April 1, 1980 to June 30, 1981. Pre-occupancy meetings, scheduled and run by the U.S. Department of Housing and Urban Development, are held approximately 3 times a year. From 4 to 12 developers, their lawyers, staff or other

representatives usually attend these conferences, where Affirmative Marketing regulations and outreach requirements are explained. MOFH staff have the opportunity at these meetings to speak with developers about MOFH's Affirmative Marketing Assistance services and to answer any questions regarding potential marketing strategy issues and problems. Developers are given the Housing Directory brochure for assistance in finding important community and agency contacts, a copy of the most recent MOFH newsletter and the MOFH service overview letter and Fact Sheet. Developers are encouraged to keep in touch with MOFH during the Affirmative Marketing Plan development process.

Because it is the responsibility of the Department of Housing and Urban Development to notify MOFH of all upcoming meetings, we contacted the HUD office to learn how many meetings were held from April 1980 to June 1981 and the number to which MOFH was invited. We learned that there is no information available on the number of conferences in 1980, but that only 2 were held in 1981. The HUD representative noted that it is often impossible to issue an invitation to MOFH because the meetings are scheduled with very short notice. However, the federal representative claimed that HUD makes a point of telling developers in the Greater Boston area to contact MOFH for assistance in minority outreach. He also added that the mere existence of and federal referral

to an agency which does provide Affirmative Marketing Assistance makes it more difficult for developers to claim they could not fulfill minority requirements.

To determine the effectiveness of MOFH's Affirmative Marketing Assistance Program, we conducted a sample survey of developers who either had received packets, were visited by counselors, or who had called MOFH during the period from April 1980 to June 1981. We interviewed approximately 50% of all these developers who had some form of contract with MOFH. Those interviews were intended to provide information on the developers' needs or desires for assistance, their awareness of the contact with MOFH and the extent to which that contact assisted them with their minority outreach efforts. It is important to note that we made every effort in each interview to speak directly with the particular individual who had the contact with MOFH. In cases where that was not possible, we tried to locate another person who was most likely to have had some knowledge or awareness of the MOFH contact.

The interview data indicate that some 44% of all developers interviewed remembered any contact with MOFH. More specifically, 40% of those who called MOFH remembered the call and 22% of those visited by counselors remembered the visit. Of the 13 developers who were mailed packets, none initially remembered receiving them and only 4 remembered with prompting by the interviewer. Significantly,

however, 5 of the developers who were mailed packets, but were not listed by MOFH as having called MOFH, said they did call to obtain names of community organizations or to request applicational referrals. The data clearly show that the majority of MOFH-initiated contacts with developers failed to make any impression at all.

We also analyzed the developers' assessment of the effectiveness of the MOFH contacts in assisting them with their affirmative marketing efforts. Of those developers interviewed who remembered the contact with MOFH initially or with prompting, only half felt that the contact was helpful. Neither of the 2 developers who remembered being visited claimed the visits provided assistance. The 2 callers, on the other hand, felt their calls proved beneficial. Because none of the 4 developers who remembered receiving packets said the packets were helpful, we examined only those who remembered a contact other than the packets. Not surprisingly, only half of those found the contact beneficial.

Five of the developers who found the contacts helpful had requested and received the names of community organizations and agencies to assist with minority outreach. In addition one developer was given listings of minority and community newspapers, and received applicant referrals while one was given an explanation of affirmative marketing

regulations and compliance requirements. According to the subjective ratings of the interviewer, two of the developers felt MOFH was very helpful, two felt the contact was somewhat helpful and two could not say exactly how beneficial the assistance was. Two of the three developers who found the contact with MOFH not helpful had already carried out their affirmative marketing plans and needed no additional assistance. The other involved a visit with a purpose other than minority outreach assistance. The three developers who were not sure that any benefits resulted from their contacts with MOFH simply could not remember any details of the contacts.

A few more observations regarding the interviews are worth stating. The visits to developers, as currently carried out, appear to be a very unsuccessful form of contact. Many did not know who MOFH was and remembered no visit. Several were small businessmen who were not involved with federal assistance or subsidies, and had no knowledge of affirmative marketing regulations. The packets also seemed to be relatively useless. As previously noted, even those developers who vaguely remembered receiving packets said they were not helpful with affirmative marketing activities. The developers who called MOFH and remembered the call appeared to be the most satisfied with MOFH's affirmative marketing assistance services. In general, many of the

respondents seemed satisfied with minority outreach assistance they had received from HUD and a few other agencies, and saw no need to pursue any other resources. Finally, despite the HUD claim that they refer people to MOFH for assistance, no developer mentioned that HUD was the referral source.

In summary the outcomes of the Affirmative Marketing Assistance services are minimal even relative to the low volume of activity. In anticipation of a more positive outcome of the interviews, we had planned to do a statistical analysis of occupancy rates before and after the MOFH Affirmative Marketing assistance. Ideally such an analysis could lead to quantitative measurement of the impact that MOFH was having. Unfortunately, however, the interviews made it apparent that no impact of this sort had occurred. Thus, we did not attempt to conduct such a statistical analysis.

Conclusions

Even at its currently low level of resource allocation, the Affirmative Marketing Program is a dubious investment of available resources. We cannot advocate expanding the current level of effort until MOFH carefully examines the focus of its Affirmative Marketing Assistance efforts and improves the degree of impact of those activities already being conducted. The original assumption that MOFH would

provide a critical supplement to HUD in Affirmative Marketing Assistance appears to have been unfounded since MOFH is not reaching that objective.

Two major issues for future policy decisions should be explored:

-We are skeptical about future indiscriminate mailings of affirmative marketing assistance packets to developers. It appears to be wasteful of resources and effort since most developers were unaware that they received them.

-Visits to developers might be one approach worthy of expansion, but only with specific improvements emphasizing quality not quantity. Careful consideration should be given to the timeliness and content of the visits. Higher standards, intensified training and more face-to face work are also necessary. A supervisor should monitor this activity by placing follow-up calls after each visit to see if the visit was made and to determine if it was initially beneficial. Several months later a second follow-up call should be made to assess longer-term effectiveness.

Procedural Recommendations

-Affirmative Marketing staff representatives of MOFH should attend all pre-occupancy HUD conferences. A system should be arranged with HUD that would guarantee MOFH involvement regardless of those meetings scheduled with short notice.

-MOFH should continue to respond to all phone or written inquiries from developers. Because the volume will most likely continue to be low, however, it will not be necessary to reserve much staff effort to perform this activity. This service should nonetheless be improved by providing easily accessible written information, including a complete listing of community contacts, minority and community newspapers and affirmative marketing regulations to all MOFH staff answering inquiries, and MOFH supervision should be available at all times.

-MOFH should continue to place specific developers' advertisements in its newsletter and encourage new developers to take advantage of this free opportunity.

MINORITY HOUSING ASSISTANCE

Findings

Providing "minority group members with knowledge about housing opportunities and their rights to freedom of choice in housing" is one of four objectives identified in the City's current Fair Housing Plan to assist in achieving a major fair housing goal of improving "the delivery of services relative to the enhancement of freedom of choice to all minorities in Boston as they relate to housing". A primary strategy for reaching this objective is the housing counseling services program operated by the Mayor's Office of Fair Housing. Supplementing these services are housing assistance components made available through contractual arrangements between the City's Neighborhood Development Agency (NDA) and La Alianza Hispana, Inc. and Cape Verdean Community House, Inc., which replaced similar previous annual agreements with the Mayor's Office of Fair Housing. The former agency, based in Roxbury, serves Spanish-speaking residents of Boston with a variety of human services, mainly households living in the Roxbury-Dorchester communities accessible to its facilities. The latter agency, also based in Roxbury a few blocks from Alianza Hispana's center, serves Portuguese-speaking residents of the Roxbury and Dorchester communities, mainly natives of the Cape Verdean

islands, with a multi-service program.

The most recent contracts under which Aliana Hispana and Cape Verdean have been delivering housing assistance services covered the period November 25, 1980 to November 24, 1981. These contracts, approved by the Mayor early in 1981, were conceived as omnibus CDBG arrangements that consolidated a prior-year contract for a wide variety of human services under the aegis of NDA with a prior-year contract for housing assistance formerly managed by the Mayor's Office of Fair Housing.

In both instances, there have been on-going disputes between the NDA and the agencies over discrepancies between the contractual amount in the Mayor's letter of award and the budgeted total submitted by the agency, the contested difference being the estimated cost of the housing assistance component. Proposed contractual amendments to correct the discrepancy had not been executed even as the contractual period had ended late in November, 1981.

Because of the persistent contractual uncertainty concerning the two minority housing assistance components, including uncertainty over the specific details as to committed resources required by the contracts, the evaluation of inputs has been clouded. If the contractual amendment for Alianza's Homeownership and Rehabilitation Program(HORP) turns out to be \$20,000, then this amount would just about

cover the annual salary and fringe benefit costs of the Program Director for its HORP. If the contractual amendment for Cape Verdean's low-income housing counseling program turns out to be \$20,000, it is less certain as to whether NDA received a full measure of the staff support required by the contract. Data collection for evaluation of the Cape Verdean contract was also hampered by reluctance of Cape Verdean Community House officials to permit evaluator interviews of the Housing Counselor until late during the evaluation period, and prolonged illness of the Center Director. According to Center officials, the full-time Housing Counselor was not paid during 1981 while the contractual amendment was in dispute, although the monthly performance reports indicate activity commensurate with his full-time employment. It was not clear from interviews with Cape Verdean agency officials, including the Housing Counselor, as to the specific activities of the budgeted seasonal Housing Counselor Aides, however. . . . Moreover, unlike the Alianza contract, which omitted any overhead for the HORP, although the Housing Counselor of Cape Verdean House spent most of his time in the field, the \$20,000 Cape Verdean budget included \$2,500 for overhead expenses applicable to the Cape Verdean Center itself.

Also complicating an independent evaluation was the shift in monitoring responsibility for the minority housing

assistance contracts from the Mayor's Office of Fair Housing to the Neighborhood Development Agency, the current funding source, and changes in the scope and detail of the monitoring role. As of July 1, 1981, MOFH was relieved of its on-going requirement under Year IV CDBG assurances to keep the Boston Area Office of HUD informed of progress concerning these contracts by monitoring their programs and by transmitting monthly program data covering such programs to HUD as part of the regular monthly reporting system to HUD. MOFH continues to receive monthly reports on housing assistance cases from the two agencies, reports that provide data on case status, the problem dealt with, and the action taken, but it currently does nothing with the data.

Contract monitoring responsibility by the NDA is far less compelling. The contracting agencies currently must report quarterly to NDA's Compliance Unit, but the standard reporting form requires rather generalized information on services and activities, with special emphasis on the income and demographic characteristics of program beneficiaries. Moreover, the current Fair Housing Plan omits any specific reference to any agency monitoring responsibility for the minority housing assistance programs.

There are distinct differences in the scope of services delineated in the two minority housing assistance contracts.

The Alianza Hispana contract applies only to its Homeownership and Rehabilitation Program (HORP), which services owners and prospective owners. A parallel Housing Counseling Program conducted by this agency primarily for tenants is supported from other than CDBG funds. Moreover, contractual roles and procedures in the HORP are definitive, thereby facilitating monitoring and evaluation.

The HORP emphasizes in-depth assistance to clients, which may extend over relatively long periods of time, and counseling that means contacts and negotiations with realtors, banks, brokers, credit bureaus, and public agencies at all levels. All Alianza staff, including agency intake staff through whom HORP clients are processed, are bilingual.

By contrast the Cape Verdean contract simply requires a "low-income housing counseling component" that ostensibly covers housing assistance both to homeseekers and homeowners on the one hand, and to apartment seekers and renters on the other, all of low and moderate income. The current contract between NDA and the Cape Verdean House omits the details of prior years' contracts on scope and procedures of such services, however. Monitoring and evaluation difficulties have been exacerbated by the lack of contractual precision on service requirements and by the wide range of the client universe eligible under the program.

Unlike HORP of Alianza, however, the housing assistance services are largely information and referral in nature, with a heavy focus on the Portuguese-speaking interpretative role. Most of the cases are closed out quickly, usually on the same day, mainly through referral to an appropriate realtor or apartment house owner in the program's community support network or to other referral sources appropriate to the problem, such as the Boston Housing Authority. Few cases require longer than a week to close out. Although the Housing Counselor is bilingual, not all of Cape Verdean's agency staff are bilingual.

Just over half the 190 cases assisted through Alianza's HORP over a recent full year (October 1980-September 1981) were provided with information and service dealing with the purchase and financing of homes. The next most important category of HORP assistance was for the resolution of utility, tax bill and property insurance problems, which accounted for almost 25 percent of client cases.

Further analysis of such HORP data indicates that the program served an average of 16 cases per month. Since the total number of new clients was 64, the monthly average of new cases was 5. By comparison, HORP's annual report for 1980 showed 72 new clients for that year, of whom 50 were seeking homes. By mid-year of 1981, HORP had an active caseload of over 80 clients.

As for the housing counseling services of Cape Verdean House, one-third of the cases served by the Cape Verdean Center over a recent full year (October 1980-September 1981) were seeking housing, either a home to purchase or an apartment to rent. The monthly reports of this agency often failed to distinguish this need clearly, however, making it impossible to group home-seeking applicants separately from the apartment-seeking clients. Another one-third of the Cape Verdean cases were requests for assistance with utility problems, most of which were applications for fuel assistance.

Analysis of HORM case files revealed that as of May 31, 1981, covering a five-year period of program operation, 26 persons provided with varying degrees of counseling services had achieved homeownership in the Roxbury and Dorchester communities.

The long delay in receiving permission to proceed with the Cape Verdean House evaluation excluded similar detailed analysis of the case files in this housing counseling component. Moreover, the monthly reports submitted by Cape Verdean House indicate that typical follow-up services to requests for housing are mainly in the form of referrals to real estate brokers, the Housing Counselor acting as interpreter and go-between, or in the form of contacts by the Housing Counselor with third-parties having expertise in

resolving housing problems (with utilities, rehab contractors, City Hall agencies, exterminators). Thus, it is difficult to attribute any positive results such as home rentals, purchases, mortgages or other outcomes directly to the activities of the Housing Counselor. Although his records indicate services to some 200 clients over a 4-year period, he conceded in our interview that his referral services have resulted in only three or four successful purchase of homes by his clients.

The original plan to use a sample telephone survey of clients to assess the impact of the minority housing assistance programs on clients served, similar to the methodology used in evaluating MOFH's housing counseling program, was abandoned because of the difficulties in conducting the survey (clients were hard to reach, many were transient, others had nothing to say), difficulties that would be compounded because of the special language factors in the minority housing assistance programs, and because of the limited findings of the experimental telephone survey applied to the housing counseling program.

Conclusions

Despite limited results and relatively low levels of cost-effectiveness, the Hispanic housing assistance programs do help reduce the handicap of language in the search of such minority residents for housing opportunities. The

longer experience and greater sophistication of the Alianza Hispana staff assigned to housing services are responsible for the more productive efforts of its program as compared with services delivered by the Cape Verdean component.

City monitoring of the minority housing assistance programs have been largely neglected since the transfer of this function from the Mayor's Office of Fair Housing to the Neighborhood Development Agency.

Recommendations

The following steps should be taken to improve contractual agency performance and to strengthen the capacity of responsible City agencies to carry out their oversight roles:

--The minority housing assistance contracts should be executed in advance of the beginning dates of the contractual performance periods.

--The provisions of future contracts should be more detailed concerning scope of services and procedures, similar to those of the Year V agreements with the Mayor's Office of Fair Housing.

--Output standards by case category should be negotiated with the contractual agencies and inserted in future contracts; outcome targets reflecting housing sales, mortgages, rentals and other indices of housing outcomes for cases handled by the contractual agencies should be negotiated with them and inserted in future contractual provisions.

--The ambiguities and discrepancies in the Cape Verdean monthly reporting system should be eliminated through mutual City-agency discussions.

--The supervision and monitoring of the minority housing assistance contracts should be formally delegated by the Neighborhood Development Agency to the Mayor's Office of Fair Housing, and the contracts should clearly delineate the scope and nature of this role.

--If subsequent evaluation indicates that Cape Verdean contractual performance fails to comply with contractual standards, consideration should be given to transferring the Cape Verdean component to Alianza Hispana's housing assistance programs.

AREAWIDE HOUSING OPPORTUNITY PLAN (AHOP)

Metropolitan Fair Housing Agency

Inclusion of this component in the evaluation design had been based on the condition in the Year V (1979-80) CDBG Agreement between HUD and the City of Boston that the Mayor's Office of Fair Housing (MOFH) should play an active part in initiating and co-sponsoring a proposal for establishment of a metropolitan fair housing agency. Thus, the evaluation team had planned to assess the effectiveness of the process being followed for achieving this objective, with particular focus of this evaluation on the degree and quality of MOFH's leadership role. After developing and submitting a proposal to HUD for establishment of a metropolitan fair housing agency in August, 1979, the Mayor's Office of Fair Housing succeeded during 1980 in generating considerable interest and cooperation among impacted public and private agencies in pursuing this objective. This effort was bolstered by the participation of HUD representatives at the regional/area levels and the encouragement of HUD officials in Washington. Although meetings convened by the MOFH, that included representation from the Massachusetts Commission Against Discrimination, Citizens Housing and Planning Association, Metropolitan Area Planning Council, Education/Instruction and other agencies with fair housing interests, concluded that the City of Boston itself was not an

appropriate jurisdiction for such a metropolitan mechanism, the discussions prompted the drafting and submission of three specific proposals for such an agency to the U. S. Department of Housing and Urban Development in 1981 for funding under its Community Development Technical Assistance Program. The wave of interest and participation in this process subsided, however, with HUD's final rejection of financial assistance to support the organization and operation of a metropolitan fair housing agency in the Boston area.

With the collapse of the federal funding effort for a metropolitan fair housing agency, the Mayor's Office of Fair Housing revised its objectives and program strategies for the 1981-83 plan and eliminated any reference to the metropolitan fair housing agency component and to MOFH's role in pursuing this objective. However, the three-year Fair Housing Plan retained "increased housing opportunities for minorities in suburban areas" as an agency objective and added City of Boston participation in the so-called Areawide Housing Opportunity Plan as a new strategy for reaching this fair housing/regional mobility goal.

Areawide Housing Opportunity Plan (AHOP)

Boston is one of 60 cities and towns in the Boston region that have agreed to participate in planning and implementation

of AHOP, which is being managed by the Metropolitan Area Planning Council (MAPC) under a package of HUD grants awarded to the State Executive Office of Communities and Development late in May, 1981, but not authorized for acceptance by the State Legislature until mid-August, 1981.

MAPC's two-volume report on AHOP identifies its primary goal as a set of guidelines that HUD can use for distributing federal housing assistance throughout the Boston region. A primary focus of the guidelines is to indicate ways in which low-income households can have wider geographical choice of housing opportunities that are outside those areas and political jurisdictions with undue concentrations of low-income or minority households.

Boston and other participating communities in AHOP have agreed to meet three-year goals for assisted-housing. To encourage such community efforts, AHOP is helping to facilitate housing production for lower income households, with special attention being given to proposed projects that mean more interjurisdictional mobility of lower income and/or minority households, that promote the development of mixed-income housing and that make special provisions for large families. AHOP also includes outreach and fair housing marketing components, with primary focus on areas which have disproportionately low numbers of lower-income house-

holds, but an employment base and municipal fiscal capacity that could support them and where there have been few prior efforts to develop assisted housing. Fair housing marketing promotional efforts are being directed mainly at several subareas of the Boston region which have fair housing groups in operation for use as channels to disseminate information and to provide counseling and referral services.

Financial support for AHOP comes from so-called HUD bonus funds: \$100,000 in 701 planning funds; \$1,500,000 in Community Development Block Grant funds; and over \$5,000,000 in Section 8 (housing certificate) funds.

As of early October, 1981, agreements (all effective as of September 1, 1981) had been completed with 13 prospective contractors, including three contractual arrangements approving housing production projects located in Boston. In addition, executed AHOP agreements provide for fair housing counselling and referral services by non-profit fair housing groups serving the South Shore and western Boston suburbs. They also include a fair housing workshop project, a suburban fair housing audit/counselling program, and a fair housing/regional mobility project under sponsorship of the Citizens Housing and Planning Association.

According to the current Fair Housing Plan submitted by MOFH to HUD's Boston Area Office, the role of the City

of Boston in AHOP was to be carried out by the Mayor's Office of Housing Development and Construction (OHDC). This role has mainly been one of helping to plan and implement AHOP through participation of an OHDC representative on MAPC's Housing Technical Advisory Committee and through review of Boston-based project proposals, a function carried out not as an administrative requirement but as a bureaucratic courtesy.

During the planning/development phase of AHOP, Boston's OHDC representative met from time to time with MAPC staff to review data on the City's housing needs and housing assistance goals and issues dealing with Boston's participation in AHOP. Among the requirements completed during this phase were verification of updated figures on the City's current housing needs and assistance, assessment of how the 7-15% standard of housing need could be achieved during the September 1979 - October 1982 period, and establishment of 5240 housing units as the City's three-year overall housing assistance goal along with formal agreement of the City to cooperate in AHOP implementation.

In addition to its proposed participation in AHOP, the City's Office of Housing Development and Construction had previously been assigned the responsibility for developing and implementing a monitoring plan covering Boston Housing Authority (BHA) activities under the Section 8 Existing

Housing Regional Mobility Program, originally initiated under a cooperative arrangement with Section 8 administrators of local housing authorities in the Boston region. The arrangement had been the City's response to a condition in the Year V CDBG agreement with HUD. However, because of administrative barriers, the BHA had early in 1981 decided to shift its efforts to a reciprocal agreement with the Massachusetts Executive Office of Communities and Development (EOCD) under which it would offer all Section 8 certificate holders selected by the BHA the opportunity to move outside of Boston, and EOCD would provide a state Section 8 certificate to any BHA Section 8 certificate holder locating an acceptable housing unit outside Boston. In return the BHA would provide a Section 8 Boston certificate to an equivalent number of EOCD tenants locating acceptable units in Boston. Under the EOCD-BHA covenant, both parties agreed that "the opportunity for statewide mobility shall be guaranteed to any person whose EOCD certificate is exchanged for a Boston certificate." Finally the agreement was to remain in effect until September 30, 1981 and the parties agreed to work toward the establishment of a more comprehensive mobility program by such date.

According to the most recent available data, covering

the June-October, 1981 period, a total of 13 households (9 family, 2 handicapped, 1 elderly, and 1 disabled) have moved from neighborhoods of Boston to surrounding cities and towns of the Boston region (4 to Cambridge, 3 to Chelsea, and 1 each to Brockton, Medford, Revere, Somerville, Watertown and Whitman) through the exchange of BHA Section 8 certificates for EOCD Section 8 certificates under BHA's Regional Mobility Program undertaken through the agreement with EOCD. Of these households, 10 were white and 3 black. All of the three minority (all black) households (2 family and 1 handicapped) moved to Cambridge.

AHOP is envisaged as the comprehensive mobility program to overcome the limitations of the prior BHA-EOCD agreement. According to the description of BHA's proposed housing counselling and referral service project under AHOP--project activities are to become official early in December, 1981 -- the following accomplishments are anticipated over a one-year period through a \$65,000 grant supplemented by \$12,000 of in-kind contributions by the BHA and \$3.3 million in Section 8 subsidy commitments covering 1000 certificates:

1. Counselling of 700 families receiving Section 8 certificates;
2. Counselling of 300 families shifted from Section 23 (leased housing) to Section 8 certificate program;

3. Conducting periodic group sessions for families interested in the option from the community in which they were issued a certificate to other communities with available rental units that may interest Section 8 recipients;

4. Coordination and networking by BHA with fair housing counselling groups which service the suburban communities in the MAPC proposed service regions;

5. Identification of landlords, small-scale and others, throughout the region who are interested in the Section 8 Existing and Moderate Rehabilitation Programs and who would also be interested in participating in this proposed program.

Whether the City has HUD approval for carrying out an interjurisdictional monitoring role applicable to the BHA component of AHOP has been raised by the state official representing the Executive Office of Communities and Development, who had written to HUD late in May, 1981 requesting clarification. The program manager of OHDC had also written the manager of HUD's Area Office seeking formal sanction of this monitoring role by the City of Boston. As of November 15, 1981 there had not been any HUD response to either letter, and the City's monitoring role remains in limbo.

Conclusions and Recommendations

Despite the eventual collapse of cooperative efforts initiated by the Mayor's Office of Fair Housing to establish a metropolitan fair housing agency, implementation of the Areawide Housing Opportunity Plan provides a stop-gap fair housing strategy to expand housing choice for minorities in the suburbs. It should be noted, however, that AHOP has a limited three-year life. According to MAPC program managers, HUD has since dropped its prior interest in sponsoring regional housing mobility initiatives. In view of the significant roles played by the Metropolitan Area Planning Council and the Executive Office of Communities and Development of the Commonwealth of Massachusetts in launching the AHOP, it seems logical for these agencies rather than the City of Boston to assume future regional leadership for establishing a permanent metropolitan fair housing mechanism.

As for the original design under which the City of Boston would plan and implement a monitoring process to assess the impact of BHA's Regional Mobility Program on minority resident households of Boston, this must await clarification by HUD's Boston Area Office of whether the original fair housing requirement under the Year VI CDBG grant agreement applies to BHA's component under AHOP. This issue has been further

complicated in a legal sense by BHA Receivership under state court decree. Moreover, since this project will not become effective until December, 1981, the operating period will have been too brief for rendering a reliable assessment of program impact even with a "green light" from HUD concerning the City's monitoring role.

HOUSING MONITORING

Findings

Over the past four years, one of the principal objectives linked to the City's goal for increasing the participation of minorities and low and moderate income residents in all City of Boston housing programs has been to monitor both the planning and design of programs and services related to the housing needs of such groups, and to measure the City's progress in achieving the performance standards incorporated in such program plans and designs. Prior to the current Fair Housing Plan, approved in February 1981, all aspects of this housing monitoring role had been assigned to the Mayor's Office of Fair Housing and a full-time Housing Monitor (under the title of Research and Program Assistant) took responsibility for coordination and implementation of an elaborate set of monitoring procedures dealing with data collection, analysis, reporting and follow-up activities by the City's housing program agencies. These housing monitoring procedures and roles were formalized by incorporating them into the 1978 Memorandum of Agreement between the City of Boston and the Massachusetts Commission Against Discrimination.

Under the current Fair Housing Plan, however, responsibility for implementing various strategies for increasing

minority participation in City housing programs has been dispersed, specifically allocated either to individual agencies or to combinations of several agencies, including the Neighborhood Development Agency (NDA), the Mayor's Office of Housing Development and Construction (MOHDC), the Mayor's Office of Housing (MOH), the Boston Housing Authority (BHA), the Boston Redevelopment Authority (BRA), the Fair Housing Advisory Board (FHAB), or the Mayor's Office of Fair Housing. The Mayor's Office of Fair Housing (MOFH) no longer has an all-embracing monitoring role over minority participation in housing programs. The Fair Housing Plan now assigns to MOFH a cooperative role with NDA and MOH in developing performance standards covering such minority participation based on determined minority housing needs. This step, to have been implemented by late in May 1981, specifically makes the MOFH responsible for monitoring the degree and nature of such participation, with monitoring implementation to be completed by the end of 1981. In view of this more restricted agency role, MOFH's Housing Monitor allocates only about 30 percent of his time to this function.

The inter-agency City effort designed to develop performance standards for minority participation in housing based on the determination of minority housing needs--an

effort that was supposed to include the MOFH--has not yet borne fruit. Neither is there tangible evidence that activities useful for performance-standards formulation--the assessment of minority housing needs on a neighborhood basis, and the development/implementation of programs and services that are sensitive to minority housing needs--have been carried out. These activities had been scheduled to produce data that would assist in evaluation and revision of CDBG housing programs/services, priorities and resource allocations. As a result, among the conditions incorporated by HUD in the Year VII CDBG agreement with the City of Boston are requirements designed to compel compliance with these provisions for increasing minority housing participation.

Moreover, the six-month schedule for reporting by the Mayor's Office of Housing of its activities to MOFH does not facilitate timely analysis by this monitoring agency that can be fed into the CDBG policy-formulation and decision-making calendar. Further complicating MOFH's monitoring role in 1981 was the fact that the six-month report from MOH (covering the period January-June, 1981), transmitted initially to the NDA in August, was not relayed to MOFH's Housing Monitor until September 1981, too late for consideration by the Fair Housing Advisory Board as part of review and recommendation functions that had to be

carried out during May and June. Thus the Housing Monitor's report to the Director of MOFH on minority participation in housing programs administered by the Mayor's Office of Housing--the Weatherization Improvement Programs for homeowners and tenants, the Urban Homesteading Program, the Interest Reduction Program for Housing Rehabilitation, and the so-called Section 312 Low-Interest Rehab Loan Program--was not completed until November 9th.

The most recent report of MOFH's Housing Monitor, covering activities of the Mayor's Office of Housing (MOH) for the first six months of 1981, clearly indicates the relatively low level of minority participation in the latter agency's larger-scale housing programs. Of 110 homeowner-heads of household who completed their involvement in the Weatherization Improvement Program during this period, 97 or 88 percent of the total were white. Of the 13 minority homeowners, accounting for the remaining 12 percent, 6 (5 percent) were black and 3 were Hispanic. Of 57 tenant-heads of households who completed their participation in the tenant phase of the Weatherization Improvement Program, 49 or 86 percent of the total were white. Of the 8 minority homeowners, accounting for the remaining 14 percent, 4 (7 percent) were black and 2 were Hispanic.

For more clearly targeted, smaller-scale MOH programs, minority participation has had a better record, mainly because they were specifically designed for geographical areas containing large concentrations of minority residents. For example, in the so-called Urban Homesteading Program, whereby HUD-foreclosed properties are rehabilitated by new owners, of the 11 successful head-of-household participants during the January-June 1981 period, 6 were white, 4 were black and one was Hispanic. Of the 5 participating tenants in this program, 4 were black and 1 Hispanic.

In the so-called Section 312 Rehabilitation Loan Program, 10 loans were approved, 8 for white homeowners (4 in the Archdale section of Roslindale, 3 in South Boston and one in the Meeting House Hill section of Dorchester), and 2 for black homeowners in the Sav-Mor section of Roxbury. Of the tenant heads of household benefitting from this program, 8 were white and one black.

There was no reported activity (no data for completed cases) in MOH's Interest Reduction Program because CDBG drawdown funds covering Year V grant applications were not made available until June 8, 1981.

Independent analysis of available cumulative data from the Weatherization Improvement Programs since their inception indicates that limited minority participation

has been a consistent pattern. Of 170 homeowners who had benefitted from the Weatherization Improvement Program through mid-1981, 151 or 89 percent were white, 8 or 5 percent were Hispanic, 6 or 4 percent were black and the remaining beneficiaries were "other" minorities. Cumulative data were similar on the proportions of benefitting tenants in the tenant phase of the Weatherization Improvement Program--99 tenant beneficiaries, of whom 88 (89 percent) were white, 5 (5 percent) were black, 4 (4 percent) were Hispanic and 2 (2 percent) were "other".

In concluding that "minority participation was not very good", MOFH's Housing Monitor made several suggestions for widening minority participation in the Weatherization Improvement Programs, including utilization of the Bay State Banner, a weekly newspaper with considerable circulation among minorities, and of Freedom House and Lena Park, community agencies serving large groups of minorities.

Earlier conclusions by the Fair Housing Advisory Board (FHAB) on minority participation in City housing programs also confirm inequities for minorities both in the allocations of housing program funds as among neighborhoods and in the actual disbursement of such funds. Despite the fact that the black/Hispanic population now accounts for

28 percent of the city's total, only 11 percent of \$19.8 million in Housing Improvement Program (HIP) funds during the first five years of this program was allocated to neighborhoods with concentrations of these minority groups. Moreover, whereas actual encumbrances and disbursements to HIP applicants in predominantly white neighborhoods exceeded the original allocations to such neighborhoods, they ranged between 55 percent and 60 percent in predominantly black neighborhoods. A progress report on neighborhood participation in the Weatherization Improvement Program (WIP), submitted to the FHAB in May 1981, showed similar low levels of minority involvement. Of 100 completed WIP cases, 88 percent were white, 6 percent Hispanic and 3 percent black, similar to the WIP case results for the January-June, 1981 period, as previously noted.

In urging the Mayor to "ensure the equitable distribution of (housing) programs (and services) to minority and disadvantaged neighborhoods", the findings of the Fair Housing Advisory Board concerning the importance of performance standards to measure minority participation in housing programs and the monitoring thereof are cogent: "Program design did not reflect real need.....Since marketing efforts are related to the program design, marketing efforts that were made had little success".

Conclusions and Recommendations

As already noted, the defined scope of MOFH's housing monitoring role is somewhat in limbo, restricted by the Fair Housing Plan to monitoring programs of the Mayor's Office of Housing, and relatively inactive while awaiting completion by the Neighborhood Development Agency of an assessment of minority housing needs (by December 28, 1981), development and implementation of programs/services sensitive to minority housing needs (by March 28, 1982), and the establishment of performance standards for minority benefit from housing programs based on the determination of minority housing needs (by December 28, 1981). Once these tasks have been accomplished to the satisfaction of HUD's Boston Area Office, the important issue will be agency responsibility for measuring housing program implementation against the performance standards, an assignment made to the MOFH in the City's three-year Fair Housing Plan.

If this housing programs/services monitoring function is to revert from a relatively passive, ineffective role to becoming a useful input into decision-making processes affecting minority participation in the City's overall monitoring housing program, it should be transferred from the MOFH to the Fair Housing Advisory Board (FHAB), as recommended in our evaluation of the FHAB. To ensure that

recommendations of FHAB's monitoring efforts receive the timely consideration of housing and related program managers, the FHAB should schedule release of its monitoring reports so that they are consistent with the decision-making timetable of the CDBG program development and review process. Moreover, periodic evaluation reports of the FHAB should include proposals to revise the performance standards as indicated by its assessment findings of housing program weaknesses and failings. Consultant services available to the FHAB, as also recommended in the FHAB evaluation, should give priority to the data collection/analytic aspects so vital to frank and effective performance of this monitoring role.

HOUSING DISCRIMINATION AUDIT

Overview of ABT Associates Report

For the past ten years, public policy toward racial discrimination in housing has been debated with much emotion and little hard evidence. In Boston, instances of discrimination have been widely publicized, but systematic evidence about discrimination has not been available. This lack of evidence apparently led many policy makers to conclude that discrimination is rare and that existing civil rights legislation is adequate to deal with the problem. The "Final Report of a Study of Racial Discrimination in the Boston Housing Market" by Feins, Bratt, and Hollister provides the needed evidence. This report demonstrates beyond any reasonable doubt that in the Boston housing market racial discrimination is widespread and severely limits the freedom of choice of black households seeking housing. Additional public policies to deal with this problem are urgently needed.

Five features of this report, which was published by Abt Associates, should be emphasized:

1. The research on which the Abt report is based is of extremely high quality. Our evaluator closely observed this research effort at all stages: design, training, implementation, and data analysis. At every stage, the Abt team demonstrated the technical and managerial skills

necessary to protect the validity of the findings.

2. The main conclusion of the Abt study, namely that racial discrimination in housing availability is widely practiced in Boston, is uncontestable. The Abt study discovered large and statistically significant differences between black and white auditors on many measures of housing availability. On the basis of this evidence, one cannot escape the conclusion that discrimination is pervasive in the Boston housing market.

3. The findings of the Abt study must be regarded as a LOWER BOUND on the extent of racial discrimination in the Boston housing market. First, the study measures discrimination in the marketing of advertised housing units. Discrimination that occurs at other stages of a housing transaction, such as credit checks or financing, cannot be measured. This issue is important because studies in other cities have found widespread discrimination against blacks in mortgage lending. Discrimination in the sale or rental of housing that is not advertised in the newspaper by a professional housing agent also cannot be measured. This issue is important in Boston because people in some neighborhoods market their housing through private channels to eliminate the possibility of facing a minority customer--that is, in order to discriminate.

Second, the Abt study purposely excludes three neighborhoods (Allston, Brighton, and the Fenway) where extensive

discrimination was found by another recent study and four neighborhoods (East Boston, Charlestown, South Boston, and West Roxbury) where blacks rarely search for housing, primarily because of discrimination. Indeed, some of the last group of neighborhoods were excluded from the study in part because of the belief that black auditors would have been in physical danger if they inspected housing units there. In short, the study leaves out neighborhoods that may have the highest levels of discrimination.

Third, the Abt researchers are cautious both in their methodology and in their interpretation of their results. In our evaluator's opinion, their methods understate the statistical significance of their results and, contrary to their own cautious interpretation, he believes that their results provide strong evidence for the existence of racial steering.

4. The main recommendations in the Abt report, namely that the City of Boston pass a fair housing ordinance and implement strong enforcement techniques, are right on target. Discrimination in housing persists despite existing civil rights legislation because it is in the economic interest of rental and sales agents to discriminate. These incentives cannot be overcome with education and good will. Instead, fair housing legislation, with severe penalties for violators,

is necessary. It is also difficult to prove that discrimination has taken place. Therefore, a regular auditing program, which can document discrimination, should be implemented as an enforcement technique.

Interpretation of the Audit Results:

Discrimination in Housing Availability

The Abt results on housing availability are dramatic and uncontestable. For virtually every type of treatment examined in both the rental and sales audits, the black auditors are treated less favorably than the white auditors at a high level of statistical significance. The only exceptions are a few of the results in particular neighborhoods. But most of these results would probably be significant as well if control variables were added to the analysis.

Black housing seekers must visit many more housing agents than do their white counterparts in order to learn about the same number of apartments or houses. Either they must pay higher search costs than whites to see the same number of housing units, or else they must choose from a smaller set of housing units and therefore be likely to end up with less satisfactory housing units than their white counterparts. The magnitude of this search cost differential is dramatic. For example, white auditors inspect 76 percent more apartments than their black teammates. In other words, a black apartment hunter will have to visit 7 rental agents

to inspect the same number of apartments as a white will see in 4 visits.

Discrimination in Terms and Conditions

Although more complex tests with control variables might uncover a few more significant differences, the evaluator finds that the Abt researchers are correct to conclude that pervasive discrimination on terms and conditions does not exist.

However, the Abt report finds that racial discrimination does exist on a few key terms and conditions. In particular, invitations to file applications in the rental market and encouraging discussions of financing in the sales market were much more likely to be offered to the white auditors than to the black auditors. Furthermore, black auditors were systematically given less encouraging signals about their qualifications than were their white teammates. An audit study only observes the marketing stage of a housing transaction. If blacks are systematically prevented from entering the next stage, which consists of credit checks and so on, or if they face discrimination during the next stage, then an audit study understates the strength of the barriers to equal opportunity in housing.

In short, the Abt results provide strong evidence that housing agents make it difficult for blacks to enter the second stage of a housing transaction. In the view of the

evaluator, these important results should be given more emphasis than they receive in the introduction and conclusion of the Abt report.

Racial Steering

The Abt researchers conclude that their study provides "little evidence of steering." Our evaluator disagrees strongly with the conclusion. In his opinion, the Abt researchers put far too much weight on one of their measures of steering and virtually ignore the striking evidence in their other three measures of steering. In general, the cautious approach of the Abt researchers may be appropriate, but in this case they have gone beyond caution and may have mislead policy makers about the complexity of the discrimination problem.

The Abt researchers offer four types of evidence about racial steering. First, they ask whether both auditors were shown the same housing units. The results are striking: Most of the time, teammates see different housing units. This result strongly suggests that steering is taking place; one set of units is reserved for whites, another set is reserved for blacks. But before one can conclude that steering exists, one must account for two other explanations of these results, namely (1) that they are driven by discrimination in housing availability (that is, blacks are simply not shown some units), and (2) that the agent often

"reserves" a unit for the first auditor to see it, whether that auditor is white or black.

These issues are considered in Table 1 below. This table starts out by restating the information in Abt tables 4-1 and 4-5. The first three rows of Table 1 indicate the number of housing units shown to both auditors, the number of units shown only to whites, and the number of units shown only to blacks. For reference, row 4 indicates the total number of units offered to blacks, which is the sum of rows 1 and 3. Discrimination in housing availability implies that more units are shown to whites only than are shown to blacks only. Hence, the difference between rows 2 and 3 measures the extent of this type of discrimination. If the advertised housing unit is "reserved" for the black auditor because he or she appears before his or her teammate, then the black auditor will be "favored" on information about the availability of the advertised unit. Tables 2-5 and 2-11 in the Abt report indicate the number of times the black auditor is favored in this manner and therefore provide a measure of the impact of "order of appearance" on the number of units shown to blacks only. The relevant numbers are entered in row 6 of Table 1. (Note that these numbers overstate the impact of order; see the footnote in Table 1.)

Because the second auditor follows his or her teammate

Table 1. Racial Steering in the Boston Housing Market

	Rental	Sales
1. Number of Housing Units Offered to Both Auditors (Including "Not Sure")	75	107
2. Number of Housing Units Offered Only to White Auditors	167	76
3. Number of Housing Units Offered Only to Black Auditors	110	41
4. Total Number of Housing Units Offered to Black Auditors (= Row 1 + Row 3)	185	148
5. Extent of Racial Discrimination in Housing Availability (= Row 2 - Row 3)	57	35
6. Number of Units Shown Only to Blacks that Could Be Accounted for by Order*	16	7
7. Number of Times Black and White Auditors Were Steered to Different Housing Units (= Row 3 - Row 6)	94	34

* Number of audits in which the black auditor was "favored" on information about the advertised unit, from Abt Tables 2-5 and 2-11. These numbers overstate the impact of order for two reasons. First, some of the cases in which the black auditor was favored might have been caused by racial steering. Second, Abt Tables 4-1 and 4-4, unlike Tables 2-5 and 2-11, refer to a reduced sample of audits. If the number of audits in the former tables were known, the entries in row 6 could be scaled down.

to an agent after a short period of time, housing units are very unlikely to disappear from the market between the visits by two teammates. Once order is accounted for, therefore, differences in the housing units shown to teammates can only be explained by racial steering. Row 7 of Table 1 gives the evaluator's measure of the extent of racial steering, namely the number of units shown only to blacks (row 3) minus the maximum number of these units that could be explained by the black auditor preceding his or her white teammate (row 6).

To see how dramatic these results are, compare the amount of steering (row 7) with the total number of units seen by blacks (row 4). In the rental housing market, blacks are steered to 94 of 185 or 51 percent of the units they are offered. In the sales market, blacks are steered to 34 of 148 or 23 percent of the units they are offered. One must conclude from these numbers that racial steering is an enormous problem in the Boston housing market.

These results are reinforced by two other aspects of racial steering examined by the Abt report. In a large percentage of the audits, the two teammates were given contradictory signals about the desirability of a particular housing unit or its neighborhood. Furthermore, white auditors were significantly more likely than black auditors to be encouraged to search for housing in the suburbs.

Given these results, one must ask why the Abt researchers conclude that there is little evidence of steering. The reason may be that they focus on the fourth part of their analysis of steering, which compares the racial compositions of the neighborhoods in which the black and white auditors were shown housing units. They find no significant differences in these racial compositions and conclude that no steering exists.

For two reasons, our evaluator does not think these racial composition results are convincing. First, the Abt measure of racial composition is very rough. To determine racial composition, the Abt researchers carried out two field observations of the blocks around each housing unit involved; that is, they personally counted the number of minorities on the street. Because no small-scale data from the 1980 Census are yet available, this procedure was the best one possible, and the Abt team is to be commended, not criticized, for attempting it. Nevertheless, the procedure is very rough and results based on it should be interpreted with care.

To illustrate the possible biases from the Abt measure of racial composition, note that in the rental audits (Table 4-2) the average racial composition observed in Back Bay/Beacon Hill is 18 percent minority, despite the fact that this neighborhood as a whole contains only one

percent black and a similarly low percentage of other minorities. In addition, the observed racial compositions in the South End and in Hyde Park/Roslindale overstate the percentage black in each neighborhood by two-fold. Until these discrepancies are explained, our evaluator believes that one should put little weight on the Abt racial composition results.

Second, even if the racial composition results are correct, they do not invalidate the conclusion, based on inserted Table 1, that racial steering exists. Instead, they suggest that housing agents steer minorities into certain buildings, not into certain neighborhoods. This practice could have serious negative consequences for minorities. For example, several scholars have argued that because their housing choices are limited, minorities are less likely than whites to reject an apartment because it is overpriced relative to similar apartments. Hence, rental agents may determine which apartments are overpriced and send only minorities to those apartments. An agent would not bother to show overpriced units to whites, because it would be a waste of his time; whites, who have many options, would be unlikely to accept an overpriced unit. Another possibility is that agents steer blacks away from all-white apartment buildings into integrated or all-black apartment buildings. Agents do not show these same buildings to whites

because agents assume that whites do not want to live in an integrated building. Thus, even if agents do not steer blacks into certain neighborhoods, the steering revealed by the Abt report could lead to the systematic allocation of overpriced apartments to blacks and could systematically prevent racial integration in apartment buildings.

Similar arguments apply to the sales market, although the Abt evidence on the sales market is more consistent with the conclusion that blacks are steered into certain neighborhoods. In four of the six neighborhoods in Table 4-6, black auditors are shown houses on blocks with noticeably higher observed percentages of black residents. Only two of these cases are statistically significant, but all four might be statistically significant if control variables were added to the analysis. As in the case of the rental audits, these results should be interpreted with care because the measure of racial composition is very rough:

Even if potential black homeowners are not steered into neighborhoods with high percentages of black residents, the steering calculations in inserted Table 1 indicate that they do face a significant amount of steering. Perhaps, as the Abt researchers suggest, blacks are steered into neighborhoods in which the percentage black is increasing. Or perhaps, as in the rental market, blacks are steered to

houses that agents believe to be overpriced. Without further research, one cannot determine which of these types of steering is more important, but the Abt results leave no doubt that some type of racial steering is taking place in the sales market in Boston.

Recommendations for Public Policy

Existing Federal, State and City policies have clearly not eliminated racial discrimination in the Boston housing market. As the Abt study documents in detail, black households are denied, in numerous ways, equal access to housing in Boston.. This lack of equal access is a serious governmental failure and it cries out for new, effective policies.

The Abt report recommends that the City of Boston pass a fair housing ordinance and lobby the State Legislature for a home rule petition that would enable this ordinance to set severe penalties for discriminators. Our evaluator strongly endorses these recommendations. In the current political climate, it seems unlikely that the Federal or State government will take the initiative to combat discrimination in housing. Defenders of equal rights must urge the City of Boston to act on its own.

The Abt report also recommends the adoption of a regular auditing program. Our evaluator strongly supports this recommendation as well. Not only is periodic auditing the best way to measure progress in eliminating discrimination in

housing, it is also the most powerful enforcement tool currently available. It is often difficult to prove that discrimination has taken place, and no other technique can compare with auditing as a means for enforcing existing fair housing legislation or for enforcing a new fair housing ordinance. Indeed, without auditing any new ordinance is likely to be as ineffective as existing laws have been.

Third, the Abt report recommends coordination of city agencies with fair housing responsibilities. This coordination is badly needed. As the Boston Urban Observatory evaluations of the Mayor's Office of Fair Housing and of the Fair Housing Advisory Board make clear, the responsibilities for fair housing policy have been scattered throughout Boston's City Government, so that no agency had significant policy-making authority or a strong base of support. Effective policy cannot be designed without careful coordination.

Finally, the Abt report recommends that the City undertake an educational effort with the Greater Boston Real Estate Board, strengthen local fair housing groups, and develop joint fair housing efforts with employers. These are all excellent recommendations, and the Abt results provide considerable guidance on how to carry them out. For example, the Abt report demonstrates that housing agents

discriminate by withholding or distorting information for black housing seekers. One way to combat discrimination, therefore, is to work out an arrangement whereby all information about available apartments or houses is readily obtainable. To accomplish this goal, housing agents could be encouraged, or even required, to describe all the housing units they are handling at a given time in a single notebook that any housing seeker could ask to see. Perhaps this type of arrangement could be implemented with the help of the Greater Boston Real Estate Board. As another example, fair housing groups could be encouraged to set up their own nonprofit housing referral services or to counsel minority housing seekers on the best ways to obtain information about housing.

None of these recommendations would be expensive to implement, but as the Abt report emphasizes, they all require dedication. Our evaluator suggest that the City of Boston immediately develop a fair housing strategy that would eventually encompass all of these recommendations. The first step is to decide who in the City government will take the lead in developing fair housing policy. The second step is to pass a fair housing ordinance and to implement regular auditing as an enforcement technique. The third step is to design education programs and to work with private actors in the housing market, such as housing agents

and fair housing groups. Carefully designed programs included in this third step could help lessen discriminatory behavior, but they should not be regarded as substitutes for the City's efforts to enact and enforce a strong fair housing ordinance. Racial discrimination in housing persists because housing agents have powerful economic incentives to discriminate. Programs based on education and cooperation cannot be expected to overcome these incentives. The foundation of a fair housing policy must be active enforcement of strong anti-discrimination legislation.

FAIR HOUSING ADVISORY BOARD(FHAB)

Findings

The Community Development Block Grant (CDBG) Agreement between HUD and the City of Boston for the Year V (1979-1980) included a condition that the City, in consultation with HUD, appoint a Fair Housing Advisory Board (FHAB) that should be "of a workable size and sufficiently broad in representation to insure the involvement of all segments of the community." The Agreement also stated that the composition of this Board "shall be representative of those citizens whose welfare is or will be affected by the City's community development and housing programs." This Board was charged under the condition with five major responsibilities:

1. Develop a three-year plan for fair housing containing goals and timetables.
2. Develop a fair housing strategy to enhance freedom of choice in the city for all minorities.
3. Review and comment upon the Community Profile developed by the City.
4. Analyze and determine from information available through the Home Mortgage Disclosure Act, State Banking Commission and MCAD or other data, where any mortgage lending patterns and banking practices have a negative effect on access to housing.
5. Evaluate and monitor the provision of public services, real estate and banking practices, and development and rehabilitation policies in neighborhoods experiencing racial transition and in integrated neighborhoods.

The Agreement also contained stipulations that the Board was to be established within 70 days of the Agreement, which was signed on August 30, 1979, and that the Board accomplish its five responsibilities within 90 days of the signing of the Agreement.

The establishment of the Board was delayed until July, 1980. A change in administrative leadership of the Mayor's Office of Fair Housing was partly responsible for the delay. Some of the respondents who were interviewed for this evaluation also felt that the delay may also have been indicative of the latent opposition of key City officials to the concept of such a Board.

On June 2, 1980, staff of the Mayor's Office of Fair Housing (MOFH) and the Boston Area office of HUD met to discuss the composition of the Board. HUD recommended that the names of five persons be added to the list submitted by the MOFH. City representatives concurred, and on June 3 invitations to serve on the Board were sent out by the newly appointed Director of the MOFH. The letter stated that the five charges of the Board must be met with a "tight timetable" and that after they were accomplished, "the Mayor would like the board to remain active to serve in an advisory capacity to the fair housing unit of the proposed Boston

Commission Against Discrimination." Thirteen individuals consented to serve and their formal appointments by the Mayor were made in July.

The Board held its first meeting on July 23 and decided to conduct its work through sub-committees. The three major sub-committees that were established included Planning (to address charges 1 and 2), Banking (charge 4), and Public Programs (charges 3 and 5). A sub-committee on Public Safety was added later that summer.

In September, 1980, the Year VI CDBG Agreement (1980-1981) was signed by the City and HUD and the mandate of the FHAB was changed substantially. Instead of the Board having the responsibility for developing a three-year fair housing plan, a fair housing strategy, and an analysis of lending and banking practices (charges 1, 2, and 4 of the Year V Agreement), the City was now assigned these responsibilities, with the stipulation that the final plans and reports "shall include the Advisory Board's review and recommendation."

HUD also continued to charge the FHAB with the responsibility for reviewing the Community Profile developed by the City, stipulating that the "City shall submit to HUD the Advisory Board's comments and any reactions by the City to those comments."

In addition to these two review and comment responsi-

bilities, which were to be accomplished by December 11, 1981, the Year VI Agreement also contained a condition that "the City in consultation with HUD will redefine the tasks of the Fair Housing Advisory Board to provide it with on-going major responsibilities in regard to fair housing issues, policies and initiatives."

In effect, therefore, at this early stage of its existence the Board's major responsibilities had been reduced to review and recommendation functions along with the task of identifying, jointly with HUD and the City, its future directions and roles.

The Board's sub-committees began to meet regularly, some on a weekly basis. The City contracted with the Massachusetts Urban Reinvestment Advisory Groups (MURAG) to conduct the analysis of lending practices required by the Year VI Agreement. The Banking sub-committee used this study as its primary source of data for review and recommendation. Because of limited City funding, however, the study was more restricted in scope (only four banks were examined) than originally planned.

The Public Programs sub-committee did carry out a review of The Community Profile, recommending more frequent data collection and monitoring, suggesting that the term "transitional neighborhood" be dropped, and that the Police

Department's annual lists be utilized more extensively. The sub-committee also recommended that the profile be drawn by the BRA, or by the BRA and NDA, other than the MOFH, because of the superior resources of these planning-related agencies.

The sub-committee failed, however, to accomplish its objective of evaluating and monitoring the provision of public services and development/rehabilitation in integrated and racially changing neighborhoods. The sub-committee questioned whether CDBG expenditures in various program areas and neighborhoods were consistent with the amounts allocated for these programs and neighborhoods. When the sub-committee attempted to research this question, it experienced difficulties in obtaining data about CDBG expenditures. Without this necessary information the sub-committee was unable to conduct any monitoring role. As the sub-committee's chairperson concluded in the interview for this study, "We simply gave up."

The Planning sub-committee proved to be the most productive of the Board's committee system. The chairperson of this committee felt that it would be more useful to make recommendations while the Fair Housing Plan was being developed rather than simply reviewing it after it has been submitted to HUD. The committee met frequently and developed an extensive outline of the type of program changes or new

programs that it felt "would result in a greater delivery of CDBG housing programs to minority households and neighborhoods." These recommendations were based on an examination of the so-called A-95 review comments made by such groups as the Massachusetts Commission Against Discrimination and the State's Executive Office of Communities and Development.

In November, 1980, a time-table for the Board's review and recommendation function was established. The Board met this objective by completing a critique of the City's proposed Fair Housing Plan by December 11, 1980. This analysis contained several specific recommendations. Meanwhile HUD asked the City to reach an agreement with the Board concerning its recommendations and withheld \$13 million in CDBG funds until such an agreement was reached. The City hired a consultant to revise the Plan in the light of the Board's comments, and in mid-January 1981 an agreement was reached. Although some Board members were not completely satisfied with the proposed revisions, they felt a need to reach an agreement since many community groups were complaining that they were being "unduly punished" because their CDBG funds were being withheld. Others stated in the interviews that they were not totally satisfied but felt that nothing more could be negotiated. The chairperson of the Planning sub-committee was extremely critical, stating that

the changes that were made did not reflect "substantive attention to the content of the Fair Housing Advisory Board's concerns."

The Plan, as accepted by HUD, contained three specific references to the Board:

1. The City agreed to brief the FHAB on the Fair Housing Plan and to begin a definition of the Board's responsibilities in February 1981.
2. The Board would be asked to comment on the City's definition of standards for minority participation in housing programs by June 1981.
3. The Board would "comment on displacement strategies" adopted by the City by August 1981.

The City failed to provide the Board with the necessary information to facilitate comment on "displacement strategies". Therefore the Board was unable to fulfill this responsibility. The Board was also critical of the City's failure to establish standards of minority participation in housing programs and in June wrote directly to the Mayor protesting the lower proportionate allocations of CDBG funds to minority areas.

These negative experiences further aggravated the tensions that had emerged as a result of the Board's major activity since January; the unsuccessful and frustrating attempt to work with the City and HUD in redefining its tasks and goals so that it could assume "on-going major responsibilities".

This process began operationally in January, 1981 with a request from HUD's Boston Area Office that the Advisory Board "list the issues that it felt should be addressed." Five issues were identified and monthly meetings were scheduled to address each topic:

February	- CDBG expenditures
March	- Security issues
April	- Minorities' concerns
May	- Year VII CDBG proposal
June	- Handicapped issues

As the Board attempted to address each issue as a frame of reference for redefining and clarifying its goals and functions, it encountered what members generally perceived as consistent resistance by participating City officials to work cooperatively with the Board or fulfill its fair housing commitments.

Many of the respondents reported that their frustrations were heightened when Neighborhood Development Agency (NDA) representatives failed to attend a meeting scheduled to examine CDBG allocations. The Board was also supposed to receive copies of the monthly NDA reports to HUD that were to summarize monthly progress in implementing the Fair Housing Plan. These reports were never prepared. Therefore, in June the chairperson of the Board and another member analyzed data supplied by NDA on CDBG allocations and

encumbrances/grants in the Housing and Weatherization Improvement Programs by neighborhoods of the city. The data in this synthesis indicated that lower proportions of CDBG allocations and expenditures were being made in minority areas than in predominantly white neighborhoods. The concerns and anger expressed by many Board members over this situation influenced the Board, in the words of the chairperson, "to become political" and to write the previously mentioned letter to the Mayor.

Most of the interviews for this evaluation were conducted during the summer months of 1981. Most Board members expressed outrage over their perception of the City's lack of cooperation and commitments and felt that the Board had merely performed a "pro forma function" (a term used by several of the respondents), thereby making it possible for the City to qualify for its deferred CDBG grant.

These frustrations and negative perceptions were further aggravated by the Board's attempts to participate in the formulation of the Year VII CDBG plan. These efforts began in February, 1981 when the Board forwarded recommendations to the City that emphasized the promotion of minority housing opportunities and increased public security and safety efforts. On several occasions NDA representatives and its Director verbally agreed that these recommendations

would be accepted. As of November 30, 1981, however, the contract for Year VII has not been finalized and most Board members expressed skepticism in the interviews that their efforts would have any impact. In May, 1981 the Board had written directly to the Secretary of HUD urging him to incorporate their recommendations as conditions for the Year VII grant to Boston. A brief letter, essentially acknowledging the correspondence, has been the only response thus far.

The relationship between the Board and HUD became even more tenuous in June, 1981 when the chairperson of the Board spoke with the Area Manager of Boston's HUD Area Office. She reported to the Board as follows: "He stated that fair housing-related conditions would probably be attached to the Year VII CDBG contract, but that they would not be as strong as they had been in previous years and that HUD would probably not be able to monitor them as closely."

As a result of these experiences some members of the Board expressed a desire to have the Board "go public" in communicating its growing frustrations and disappointments. When a majority of the Board opposed this strategy, the very active and conscientious chairperson of the planning sub-committee resigned, questioning any past or future effectiveness of the Board. It was a most significant and, to many, demoralizing event.

In July, 1981 the Board's chairperson met with the Director of NDA to continue discussions over the Year VII contract. She received assurances that such specific Board proposals as the retention of MOFH within the NDA and the funding of the public safety program recommended by the Board would be included in the submission. Soon after this meeting, however, the Director announced his resignation from the City, effective November 17, 1981.

The Board decided not to meet in August, 1981. At the September meeting the relationships between the Board, the City, and HUD were reviewed. In addition to the concerns over HUD's future commitments to fair housing, the Board's experiences with the City, and the resignations of the City's Director of NDA and the Mayor's Special Assistant for Housing Development and Construction, both the Director and Deputy Director of the MOFH also announced their intentions to resign. (The Director of MOFH subsequently changed his mind). The Board voted to write to the Mayor to inquire about future staffing and directions, and decided to suspend any further meetings until the City and HUD were able to clarify and define their fair housing policies and commitments. (Although no meeting was scheduled for October, 1981 a special meeting was called that month at the request of the president of the advertising firm that was

developing MOFH's Media Campaign. The chairperson of the Board and two other members attended and made several suggestions to strengthen the television advertisements. The Board will continue to monitor and evaluate this campaign).

Conclusions

In designing the evaluation system for measuring the effectiveness of fair housing programs, the research team made distinctions between measures of outputs (types/quantities of products/services generated) and outcomes (the consequences/impacts of activities on fair housing conditions). Although the work and impact of the Board cannot be statistically measured, these two perspectives provided useful evaluation guidelines.

1. Review and Recommendation Functions

By applying the output-outcome distinctions to the work of the Board in fulfilling its review and recommendation functions with regard to the City's fair housing plan, community profile, and banking study, it is evident that the Board was effective with respect to its output, but the Board's perception of failures in outcome, which is strongly supported by the events discussed in the preceding section, precipitated diminishing effectiveness.

2. Redefinition of Tasks and Responsibilities

After completing its review and recommendation functions, the Board failed to produce any significant outcomes. Its perceived failure to effect change resulted in declining commitment and attendance, resignations, and the current suspension of activities.

3. Perception of City and HUD Support

The perceived failure of the City and HUD to demonstrate active support for output (work of the Board) and outcome (implementation of Board products in a manner that will affect fair housing conditions) is the major reason for its decline.

In applying the output perspective to an evaluation of the FHAB process, it is clear that the requirements were followed and completed with the establishment of a functioning Board. However, as the preceding section emphasized, by the time the Board became functional, eight months after the deadline for its establishment, a new CDBG agreement had substantially changed the functions of the Board to those of review and recommendation. The evidence clearly indicates that the Board carried out these altered roles. Its most extensive work concerned the review of the City's three-year Fair Housing Plan. After the review was completed, HUD withheld the \$13 million in CDBG funds until the City revised the plan in accordance with the Board's recommendations.

Ironically this area of greatest activity and accomplishment also contributed significantly to the Board's eventual decline. The very fact that HUD had to force the City to revise the Plan created or reinforced concerns held by Board members about potential effectiveness.. Most respondents expressed very sharp criticisms of the

City in discussing this episode. They also emphasized their frustrations in trying to work with the City after the funds were released and interpreted those experiences as further evidence of the City's opposition to any meaningful implementation of fair housing goals. As one member summarized: "The real tragedy is that once the money was released, the City pulled back on its commitment." In his letter of resignation the chairperson of the Planning sub-committee, who conducted the review of the Plan for the Board, stated bluntly, "I am unable to identify any area where the presence or activity of the Board is making an important difference."

Indicative of these perceived failures to effect change was the failure of responsible City officials to comply with the three components of the Plan (assisting the Board in the redefinition of its task, establishing standards of minority participation in housing programs, and developing displacement strategies) that required the participation of the Board. The City failed to provide the Board with the necessary data for the review of minority participation and displacement strategies and failed to provide significant assistance to the Board in the redefinition of its roles.

Similar conclusions of output and outcome evaluation

dimensions apply to the other review and recommendation functions. The Board completed its mandate to review the City's analysis of lending institutions. However, because of limited City funding, the study was more restricted in scope than originally planned and only four banks were examined. The issue of outcome for this activity persists, however. Over the summer months of 1981 the Board was still discussing ways to utilize the results of the study and planned to have the sub-committee chairman meet with the State Banking Commissioner.

The same problems have characterized the Board's attempts to fulfill its responsibilities in reviewing the Community Profile. The output was achieved (i.e. reviews and critiques, as required, were completed), but the Board expressed its discontent over the failure of the City to provide assurances that their suggestions will be accepted.

The Board has accomplished relatively little since January, 1981. The Year VI Agreement stipulated that the City, in consultation with HUD, would redefine the tasks of the Board. The three-year Fair Housing Plan stipulated a January deadline for the City to begin this process with the Board, yet very little support or direction in this task has been provided by either the City or HUD. Lacking this involvement and cooperation, the frustration and

confusion expressed by most Board members from time to time heightened, attendance at meetings declined, and resignations occurred.

In effect, the initial skepticism held by many Board members over the City's reasons for appointing the Board, the perception that it was a pro forma gesture to guarantee CDBG funding, were reinforced following the completion of the review and recommendation functions. As one active member of the Board stated in the interviews, "We felt that one of our functions from January on was to monitor, but since there were no NDA or Office of Housing reports, there was nothing to monitor."

The Board's perception of HUD's failure to provide significant direction was attributed to a change in national administration and the uncertainties about HUD's future fair housing policies and strategies. The comments of the Area Manager of HUD's Boston Area Office, as shared with the Board through its chairperson, led most members to conclude that HUD was relaxing its concerns and commitments. Members were also especially critical of the failure of the HUD Area Office to provide representation at every meeting, and of its pattern of sending different staff representatives to meetings. Although HUD's intent, as explained by a HUD official in the interviews, was to en-

courage the Board's independence, this strategy was not understood and produced a pervasive negative perception of HUD's commitment.

Active, supportive roles from both the City and HUD are essential for salvaging and strengthening the status and effectiveness of the Board. The evidence strongly suggests that the only time the City provided such support was when HUD had mandated this action as conditions for CDBG funding or the release of CDBG funds. As one Board member put it, "Our only leverage has been with HUD. If they should pull back, there is nothing other than individual persuasion and lobbying."

III. Recommendations

1. Membership and Governance

As emphasized, a small core of active members remains on the Board. (In every interview, the need for membership restructuring was mentioned.) Almost all respondents emphasized the need for additional committed members, especially from banking and real estate interests. Some also strongly urged the appointment of people with more "prestige" or "power".

The decline in attendance and membership can be attributed, in large part, to the frustration the Board experienced in its work. Until those factors and sources of

frustration are addressed, especially the perceived operational commitments of HUD and the City, these problems of attendance and membership will persist. We do feel, however, that the composition of the Board should be restructured and expanded.

In addition to these issues of membership, many respondents also criticized the Board for its lack of duly established process and procedure. In effect, the Board has been functioning for over a year on an ad hoc basis, without any by-laws or other procedural guidelines. As a result, the working effectiveness of the Board has been dependent upon the initiative and commitment of individual members rather than upon process, and little continuity has occurred from one meeting to the next.

In view of these problems we recommend that the Board establish a Committee on Governance and Membership. The first tasks of this group will be to recommend by-laws, including provisions that provide for the organization of other standing committees, and to define categories of membership for a reconstituted Board. After completing these initial responsibilities this committee would continue as a standing committee of the Board.

We further recommend that after the membership categories have been defined, a committee with equal representa-

tion from the Board, the City, and HUD select the candidates for appointment by the Mayor. This procedure should help strengthen the status and independence of the Board and resolve membership problems in a more direct and thorough manner.

The reconstituted Board should be appointed by January 31, 1982 so that it may participate in the examination of the Fair Housing Evaluation Report as discussed in Recommendation 3.

2. Redefinition of Tasks and Responsibilities

Once again we recognize that a successful response to this vexing problem cannot be accomplished without the committed support and assistance of responsible HUD and City officials. We do recommend, however, that the Board, using this evaluation report as a data resource, initiate a goal formulation process that will result in the selection of new goals and specific plans and strategies. In conducting this examination at least three possible orientations should be considered. These options were expressed, or implied, by several Board members in the interviews conducted as part of this study.

1. Monitoring - having completed its reviews and recommendation functions, one important future direction of the Board would be to monitor CDBG allocations and program performance to insure that the allocations and expenditures are consistent with fair housing goals, HUD contract conditions and

special assurances and that performance indicates responsiveness to the needs of low-income and minority persons and households. One such mechanism already exists: HUD requires such a report from the City by the tenth day of each month, and Board review of such reports, with appropriate follow-up, should become a priority Board activity. An expansion of staff resources available to the Board would enable it to expand its monitoring role in this and other ways. (See Recommendation 6.)

2. Networking and Support - this role would entail working with such City agencies as the BHA, NDA, Mayor's Office of Housing Development and Construction, Mayor's Office of Housing, and Police Department to ensure that their goals and performance reflect fair housing policies. With the assistance of additional staff the Board could also establish linkages between community groups which are concerned in general with housing issues that have fair housing implications.

3. Advocacy - this would engage the Board in performing a strong public role in addressing fair housing issues and concerns. For example, it could publicize such reports as the audit, sponsor open forums on fair housing for community groups, and provide periodic advice to the Public Information Unit of the Mayor's Office of Fair Housing.

In addition to these delineated responsibilities, we also recommend that after the City adopts a Fair Housing Ordinance, the Board should conduct another examination of its goals to identify any changes in its roles and responsibilities that may be required by the provisions of such an Ordinance. Since this is the only citizen's group

that is addressing fair housing issues, we feel that it should be linked in advisory capacities to the new mechanisms and procedures that may be established by the Ordinance.

3. Fair Housing Audit and Program Evaluation Reports

As stated in the proposal for this evaluation project, we recommend that the Board assume primary responsibility for making appropriate policy recommendations to HUD and the MOFH based on the results of the audit and the evaluation of fair housing programs. More specifically we recommend that a meeting (perhaps an all-day conference) be convened by an outside body (e.g. the Boston Committee or the University of Massachusetts, through the Boston Urban Observatory) in February, 1982 with representatives from MOFH, HUD, MCAD, and the Boston Committee in attendance. The major purposes of this meeting will be to discuss the implications of evaluation findings and to secure feedback on any policy recommendations that the Board may submit, including the recommendations pertaining to the organization, membership, and roles of the Board which will result from its examination of this evaluation report.

4. Relationship to the City

As this report has emphasized, Board members consistently criticized the City for its perceived lack of commitment and concern. Many cited the absence of any

structured linkage to the top levels of City administration as a major factor that has contributed to this problem.

Although structural change does not directly address the larger issue of a perceived recalcitrant City government, we do recommend that the Board have more direct access to the levels of City administration that are responsible for policy formulation and implementation in housing and related areas that impact on fair housing issues.

Specifically, we recommend that the Board report directly to the Deputy Mayor for Development. In addition, we also feel that it is important and valuable for the Board to meet directly with the Mayor(perhaps twice a year) to discuss its work and concerns. As Mayoral appointees, the Board should request and be granted such access.

5. Relationship to HUD

Respondents complained about HUD's failure to provide consistent representation at Board meetings. The absence of such representation contributed significantly to the widely shared perception of HUD's lack of commitment. In addition to responding to this problem of perceived limited interest, we also feel that representation at Board meetings would enable HUD to gather more first-hand perspectives about fair housing progress in the city.

We therefore recommend that a delegate from the Area Office be appointed each year as the official representative

of HUD. This delegate will not only be monitoring the Board and fair housing progress in general, but this participation will also give the Board another resource from regional and national policy perspectives. In the interviews the Board chairperson stated that the Board was never informed of Area or Regional Office fair housing policies or action. Such participation would provide this knowledge and also enhance coordination between HUD, the City, and the Board on fair housing matters.

5. Staff Resources

As emphasized in this report the Board's effectiveness has been seriously impaired by its inability to gather or collect the information and data that was necessary for fulfilling its monitoring and evaluation responsibilities. The part-time liaison assistance provided by MOFH was helpful but insufficient. The experiences of the past year clearly underscored the importance of adequate resources for data analysis and administrative services.

We recommend that these resources consist of a full-time staff person supplemented by consultant services. The staff person should be hired by the Board and report directly to its chairperson. The consultant services arrangement will be managed by the staff person upon approval by the Board of the proposed scope of services.

These resources would be applied generally to strengthening the Board's capacity in the two major areas of need that have impaired its relative effectiveness - (1) monitoring, networking and advocacy function; and (2) administrative function. Initially, the staff and consultant resources would assist the Board in the implementation of the findings and recommendations of BUO's Fair Housing Program Evaluation and Abt Associates' Audit. In addition, these staff and consultant resources will be utilized to provide continuous program evaluation under the priorities and directions of the Board. This role will also include the monitoring and policy follow-up of periodic fair housing audits.

The staff person's responsibility for providing administrative services to the Board would include such activities as preparing and distributing Board minutes, serving as Board liaison to city agencies and community groups, and serving as a general administrative assistant to the chairperson and Board committees. The liaison assistance provided by MOFH has been helpful at times, but the Board chairperson and other members expressed a critical need for more sustained and effective administrative assistance.

It should be emphasized that the roles and responsibilities of the Fair Housing Advisory Board differ intrinsically from those of the Mayor's Office of Fair Housing. The Mayor's Office of Fair Housing has emerged as the nucleus

of a fair housing services delivery system at the local level that uses housing counseling, public information, affirmative marketing assistance, Hispanic and Cape Verdean housing assistance and monitoring of certain programs with fair housing implications to enhance housing choices for community residents. Moreover, if a Fair Housing Ordinance becomes law, MOFH will become a constituent division of the proposed Fair Housing Commission which the recently submitted Ordinance designates as its investigative and mediation agency.

Experience indicates that MOFH has had limited success in monitoring and influencing decisions of agency equals or of higher-level decision-makers, such as NDA, the Mayor's Office of Housing Development and Construction, and the Mayor's Office of Housing, the representatives of whom believe and tend to resent the fact that the agency's very existence depends entirely on HUD sanctions in CDBG agreements.

The Fair Housing Advisory Board is not a direct services organization. It is a relatively autonomous body, responsible only to the Mayor, which should be linked to the highest levels of City and HUD decision-making. Its monitoring and advocacy roles are designed to help in the formulation and re-formulation of the City's fair housing policies and

strategies, to assist in establishing and strengthening fair housing networks and constituencies, and to serve as principal advocate of fair housing principles and practices. The Board's own staff and consultant assistance are intended only to facilitate performance of these special responsibilities.

